NJX000316968

State of New Jersey Department of Environmental Protection and Energy Manifest Section

CN 028, 401 East State Street Trenton, New Jersey 08625-0028 NJ 1) 981 489 677

"Request to Deactivate EPA ID Number"

EPA ID No//_	0581489677		7		
Company Name:	QUALITY	CLEANS	n.	The Park	
Site Address:	(street)	LLINGS A	p	(city /	town)
	(state)	(zip code)		(lot)	(block)
Mailing Address:	SAN E			(city / town)	
		The state of the			10150
	(state)			(zip code)	
Company Contact: _	RAFFE KE (name)	SAYAN	(609)	a code and phone	88
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Is the site presently	occupied? (circle	ves or no)			
Sign and date the ap	plication below, an	d retain the last	page (pin	k copy) for y	our records.
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(printed	name)		(signa		
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Submission of false information is a violation of N.J.A.C. 7:26-5.6 and N.J.A.C. 7:26-7.3.

copies: White - Manifest Section Yellow - USEPA Region II Pink - Applicant

Md 12/14/94 1/R- 2N20

HAT THE

DEXCEOSIGN 3

State of New Jersey
Department of Environmental Protection and Manifest Section

Manifest Section

Cri 028, 401 East State Street

Trendon, New Jersey 0862840028

Request to Deact vate EPA ID Number'

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subtible of N.J.A.C. 7:26. Seat N.J. A.C. 7:28-7.3.

WW 1 8 1883

ATTACHMENT

The EPA has reviewed your response, dated April 19, 1998, to the first Information Request, dated April 1, 1998. Your response included a letter addressing question no.'s 1, 2, and 3; an invoice from APCON Environmental Services, Inc.; a laboratory analysis of the mineral spirits in the tanks, by International Petroleum Corporation of Delaware; and a Uniform Hazardous Waste Manifest for transport and disposal of the fuel oil by Prickett's Industrial Tank Cleaning Corporation.

Please provide responses to the following questions:

- 1. The sampled components include arsenic, cadmium, chromium, lead, PCB's and flash point.
 - a. Were the samples analyzed for total components or for the toxicity characteristic //o (Toxicity Characteristic Leaching Procedure)?
 - b. Why were these components the only oneschosen (for example, benzene may be a reasonable substance to analyze for, in addition to the ones which were sampled for)?
- Was sampling for any other components conducted? If yes, please provide the results of analyses and identify the type of analysis conducted (i.e., TCLP).
- In your response, you say that APCON disposed of the solvent. Where did APCON take the solvent? Please explain clearly and also include any documentation pertaining to the disposal. Also include additional shipping papers and/or manifests (which have not been submitted in your 4/19/98 response) for shipments of these petroleum solvents by APCON. Include applicable solid/hazardous waste transporter authorization numbers, including any EPA Identification numbers, for the transportors) and the facility(s) to which it was delivered (including address and applicable solid/hazardous waste destination facility authorization numbers).

APCON= a broker International Petroleum Services did sampling, removal, adisposal

12-19-2

FROM : QUALITY cleaners

PHONE NO. : +609 962 7488

Jul. 16 1998 05:01PM P01

#1

QUALITY CLEANERS

1406 COLLINGS RD SOUTH, CAMDEN, NJ 08104

ATTENTION: MS. HALLEY

FAX COVER

FROM: RAY			
DATE:			
# OF PAGES:_3	-		
MECCACE			
MESSAGE:			
MS. MARGAROT	The	IPC15	ADDRESS is
		COS 50	UTH MANKET ST.

WILMINGTON DELAWARE

Please call 609 962-7488 if you have any questions regarding this transmittal.

#1

QUALITY CLEANERS

1406 COLLINGS RD SOUTH, CAMDEN, NJ 08104

ATTENTION: MS. HALLEY

FAX COVER

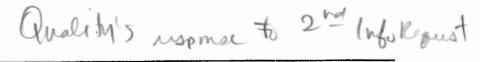
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WILMINGTON DELAWARE

Please call 609 962-7488 if you have any questions regarding this transmittal.

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2569 Huntingdon Pike, Huntingdon Valley, PA 19006 • (215) 947-TANK • 1-800-887-2222 • FAX 947-3959

July 14, 1998

Quality Cleaners 1406 S. Collings Road Camden, NJ 08104

ATT: Ray Kessyan

Dcar Ray:

We are in receipt of your fax regarding the transportation and disposal of mineral spirits and offer the following:

APCON Environmental Services Inc. contracted with International Petroleum Services through Atlas Environmental Services and acted strictly as a broker in this transaction. The information provided was based on that which you supplied to us, representing the material as mineral spirits. The material disposed of was sampled and analyzed by IPC as indicated on the laboratory analysis attached. It appears as if no TCLP analysis was performed as suggested in the Department of Environmental Protection's letter (question #1).

In response to question #2, attached is a copy of the manifest provided by IPC. We have no other information other than that provided.

If you need more information, you may want to contact IPC directly at (302) 421-9306.

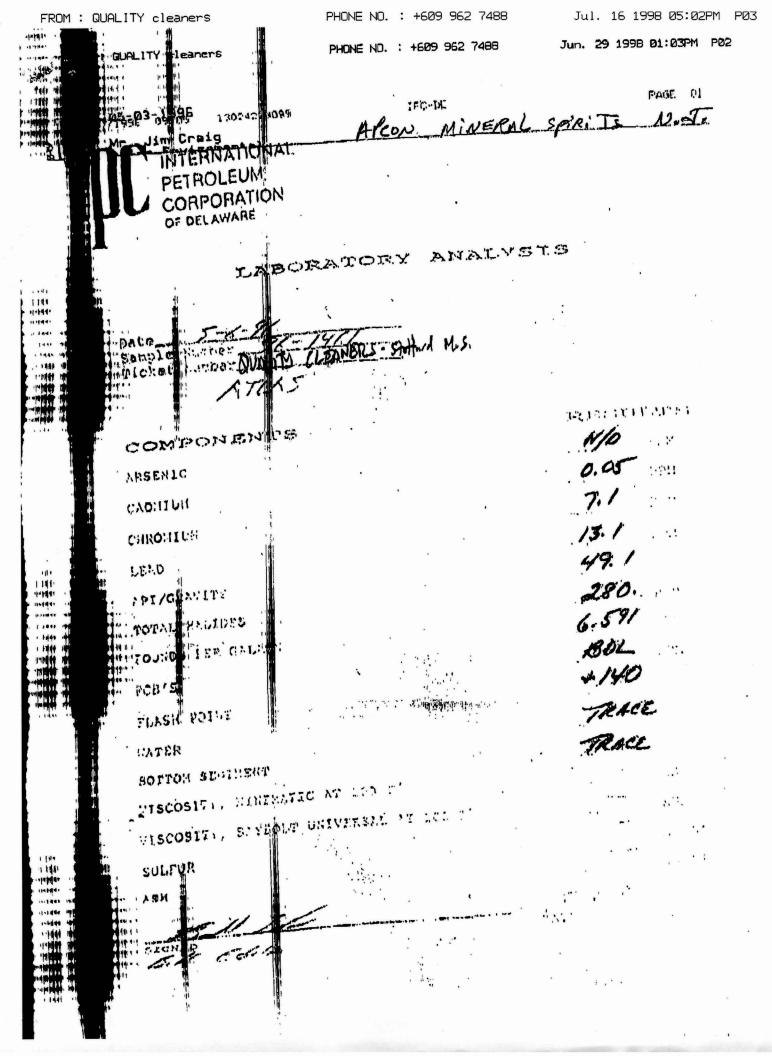
Sincerely,

Adam S. Reiff

President

Attachment

qualitycleaners



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Please go to the reverse of this form and provide the requestant of og session. X DESCRIPTION OF HAZARDOUS WASTES S. RUBBERGUERR PRESENTANTON CHRELYTTYLION & REVIEW OF Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous wasts activity or a subsequent notification.

If this is not your little action, enter your installation's EPA I.D. British ig the pace provided below. AIII EIKEL OK SUBSEQUENT MOTIFICATION METAW D C HICHMYA (((I))) VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate boxies)! C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION **HARBOBRANON** PEDERAL (IIV mail stolemos) NOITATHORENART . MOLLAHENED AND AT LASE OF HYXYKBOOR WYZLE VCLIAILA (suist., X., in the appropriate box(ss)) 13 Henro Tabel encitallatem to eman D HONE HO. (area code & no.) D 3 0 8 3(4(4)4) 312 DOCUMENTAL POLIT bee notiesteened astuores and to 0108 notices? information requested herein is required by law CATION before completing this form. The P INSTRUCTIONS FOR FILING NOTIFIporter's principal place of business, Please refer treated, stored and/or disposed of, or a trans-

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AGENCY, REGION II NEW YORK, NY.

ATNO SEE THISTERO NOS - 101

PHONE NO.: 2153332551

Jul. 27 1998 08:29AM P2

302-421-9099 TO: 2153332551 Sent (FAX'cal) From Atlas

PAGE: 01

International

505 S. Market St. Wilmington, DE 19801 1-302-421-9306 1-800-222-2511

OTHER I.O.S. LOCATIONS

6305 E Lombard St Baltimore, MD 21224 1-410-633-0606

USED OIL MANIFEST

(NON-HAZARDOUS)

40629

Fairborn, Georgie Plant City, Florida New Orleans, Louisiana EPA. I.D. NO. DED984073692 DATE OF BERVICE E.P.A. LD. NO. MDD985389818 10-02-4 COMPANY AND LOCATION BILLING, AUDRESS

CONTACT TIME OF SERVICE TANK SIZE

STAHTING

WASTE DESCRIPTION HIW 30% WATER Wrums

ENDING

VOLUME . TOTAL

TANK MONITOR SERVICE



12drums 20/Drums = 240.07

LO.S. ASSUMES RESPONSIBILITY FOR THE SAFE REMOVAL AND RECYCLING/TREATMENT OF WASTE FLUIDS IN. ACCORDANCE WITH ALL STATE AND FEDERAL LAWS.

RECEIVABLES	
PAYMENT RECEIVED YES NO	TO BE BILLED? EYES NO
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DATE PAID	□ YES □ NO

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. INVOICES REFLECTING CHARGES TO CUSTOMER ARE SUBJECT TO AN INFEREST RATE OF THE LESSER OF 1 12% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY INVOICES THAT ARE NOT PAID WITHIN 30 DAYS. IN THE EVENT OF DEFAULT, INTERNATIONAL OIL SERVICES SHALL BE ENTITLED TO RECOVER COSTS OF COLLECTION, INCLUDING REASONABLE ATTORNEY'S EFFS

GENERATOR WARRANTS AND REPRESENTS THAT THE MATERIALS PROVIDED INTERNATIONAL OIL SERVICES HEREUNGER HAVE NOT BEEN MIXED. COMBINED, OR OTHERWISE BLENDED IN ANY QUANTITY WITH MATERIALS CONTAINING POLYCHLORINATED BIPHENVLE (PCB) OR ANY OTHER MATERIAL DEFINED AS A HAZARDOUS WASTE UNDER APPLICABLE LAWS INCLUDING BUT NOT LIMITED TO 40 CFR PART 281. GENERATOR AGREES TO INDEMNIFY AND HOLD INTERNATIONAL OIL BERVICES HARMLESS FOR ANY DAMAGES, COSTS, ATTORNEY'S FEEG, ETC. ARISING DUT OF OR IN ANY WAY RELATED TO A BREACH OF THE ABOVE WARRANTY BY THE GENERATOR.

SENERATOR/CUSTOMER SIGNATURE

1,000,000

新工程 经销售 网络

Letter by next week (wkg 5/18

MEMORANDUM

To:

Joel Golumbek

From:

Margaret Halley

Re:

Quality and Atlantic Cleaners' Response Reviews

Date:

May 12, 1998

Quality Cleaners (NJD981489677/NJX000316968):

The response is confusing. Both waste oil (NJ DEP waste code X722) and Stoddard solvents were removed from the facility's two tanks. The response indicates that APCON Environmental Services, Inc. (2569 Huntingdon Pike, Huntingdon Valley, PA 19006), transported and disposed of approximately 660 gallons (12 drums) of Stoddard mineral spirits. The o/o provided an invoice and stated in his letter that APCON disposed of the mineral spirits. APCON claims the waste is non-hazardous. The laboratory analysis, done by International Petroleum Corp. (IPC) of Delaware, sampled for As,Cd, Cr, and Pb, and flash point. Cd, Cr, and Pb had hits, but flash point was > 140. Parts of the copy are illegible, so I don't find if these are totals or TCLP (it appears to be totals). Was IPC contracted to APCON or to the dry cleaner to do the analysis? Since the mineral spirits are from years ago, it would have been logical, also to sample for benzene (as well as for perc). I am awaiting a call from EPA Region 3 as to whether APCON is a RCRA notifier. The hazardous waste determination appears to be inadequate.

To make matters more confusing, Prickett's Industrial Tank Cleaning Corp. (NJD071454276) manifested 600 gallons of X722 to themselves (copy attached).

We need to determine:

4. If samples are totals or TCLP?

Was sampling for any other parameters done?

- 3. What is IPC's relationship to APCON and/or the dry cleaner?
- 4. What did APCON do with the solvents?
- 5. Is APCON a RCRA notifier?
- 6. Did APCON give the waste to Prickett to handle?
- 7. Why does Prickett manifest X722 waste to its own facility?

Although many items do not corroborate, the o/o appears to be trying to comply, but doesn't have the resources, apparently, to determine if the contractor(s) is in compliance himself.

I recommend a second § 3007 to Quality to clarify these issues, with follow up to APCON concerning this company's potential violations (ourselves or referral to Region 3).

Atlantic Cleaners (NJD981139116):

Acceptable. In addition, the o/o asks for suggestions from us as to how she can prevent and clean up perc spills. Following the NCA seminar on 5/20, where I want to get additional suggestions concerning perc spills, I recommend a qualified thank you letter with suggestions or outreach material relevant to her situation (that we haven't given her already).

DTCW totals

3) = 4 200 N=

From ES

NOTIFIED

Department of Environmental Protection Hazardous Waste Regulation Program Manifest Section CN 421, Trenton, NJ 08625-0421

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JOB # 2937

ase type-or print in block letters. (Form designed	for use on elite (12-pitch) typewriter.)		Form App	roved. OMB	No. 2050	-0039. Expires 9-30
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest cument No. 7 2 3 2	2. Page 1	Informa	ation in th	ne shaded areas by Federal law.
Prickett's Ind. Tank Clean 1940 Harris Drive	ing Corp.			anifest Docu		7232
Deptford, N.T 08096			B Hit C	leaner	(Genan)	collings
4. Generator's Phone (609) 228- 5. Transporter 1 Company Name			Camden	N.J		Collings
	6. US EPA ID Number ing Corp. N J D 0 7 1 4 5		C. State Tr			0.17.18.18.1.1
7. Transporter 2 Company Name	8. US EPA ID Number	12/16	D. Transpo	Decal N rter's Phone		77741
		1.1.1	E. State Tr	ans. ID-NJDI	1609 EPE 1	228-1071
9. Designated Facility Name and Site Address Prickett's Ind. Tank Clean	ing Corn			Decal N	0	-
1940 Harris Drive	ing corp.	*	F. Transpo	rter's Phone	()
Deptford, NJ 08096	INITIDIOIZIAIGIA		G. State Fa			
11. US DOT Description (Including Proper Shippin	IN J D 0 7 1 4 5 4	12. Conta		13.	14.	228-1071
HM ID Number and Packing	Group)	No.	Туре	Total Quantity	Unit Wt/Vol	I. Waste No.
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J. Additional Descriptions for Materials Listed Abo	ove		K. Handling	Codes for V	Vastes Li	sted Above
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5. Special Handling Instructions and Additional In	d.		b.		d.	
Hazardous waste in New Jers	ev, but not according to us	EPA				
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Emergency response guide #			Deca1	# 7	174	11
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economically practicable and that I have selecte	have a program in place to reduce the volume and d the practicable method of treatment, storage, or d	toxicity of wa isposal curre	iste generale intly available	d to the degree to me which	ree I have i minimize	determined to be
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9. Discrepancy Indication Space		4				
). Facility Owner or Operator: Certification of recei	pt of hazardous materials covered by this manifest	excent as no	oled in Item 1	9 .		Safety .
Aymond E. Martin JR.	Signature	000	Voite	-1	Мо	onth Day Year
Form 8700-22 (Rev. 9/88) Previous editions are obsolete.	SIGNA ORE AND IN	FORMA	ON MUST	BE LEGIE	BLE ON	ALL COPIES

APR 01 1998

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

RE:

Information Request

Quality One Hour Cleaners

EPA I.D. Number NJD981489677/NJDEP I.D. Number NJX000316968

Dear Mr. Kesayan:

The U. S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act, 42 U.S.C. Sections 6901 <u>et seq</u>.

EPA may require parties who handle or have handled hazardous waste to provide information relating to such wastes. EPA hereby requires that you provide the information requested in the Attachment to this letter. This information is necessary to determine the compliance status of Quality One Hour Cleaners.

Please provide the information requested no later than thirty (30) calendar days from receipt of this letter. Requests for additional time must be justified. Requests for additional time must be made within five (5) calendar days of receipt of this letter. The response must be signed by a responsible official or agent of your company.

The response in the Attachment must be mailed to the following:

Ms. Margaret Halley RCRA Compliance Branch Division of Enforcement and Compliance Assistance U. S. Environmental Protection Agency - Region 2 290 Broadway, 22nd Floor New York, NY 10007-1866.

Failure to respond in full to this requirement may result in federal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C., Section 6928.

If you have any questions about this letter, please call Ms. Margaret Halley at (212) 637-4133.

Sincerely yours,

Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc: Margaret Halley (2DECA-RCB)

Hannah Maciejko (2DEPP-RPB) Carl Plossl (2DECA-RCB)

ATTACHMENT

Pursuant to the hazardous waste regulations, specifically 40 C.F.R. Section 262.11, a person who generates a solid waste must determine if that waste is a hazardous waste either by applying knowledge of the waste or through an analysis of a representative sample of the waste. If knowledge of the waste, rather than analysis, is used to make a hazardous waste determination, the generator must be able to support its determination by documenting its knowledge of the waste. On the other hand, if the generator's determination is made by analysis, re-analysis is only necessary if the waste stream has changed.

EPA inspectors conducted a RCRA compliance evaluation inspection of your facility on January 14, 1998. During this inspection, you told the inspectors that "two summers ago," petroleum solvent waste, including sludge and water, were generated during tank cleanout and closure. You told inspectors that this cleanout was of two (2) tanks of five hundred (500) gallons each in capacity.

Please provide responses to the following questions:

- 1. What are the specific dates in which the petroleum solvents were generated?
- 2. How did your facility make a hazardous/solid waste determination for the petroleum solvents removed from the tanks? Please provide documentation, including any test results obtained from sampling and analysis.
- 3. What is the amount of the petroleum solvents that were sent off site? Please send photocopies of all manifest and/or shipping papers for shipments of these petroleum solvents. Include the name(s) of the transporter(s) (including address and applicable solid/hazardous waste transporter authorization numbers) and the facility(s) to which it was delivered (including address and applicable solid/hazardous waste destination facility authorization numbers).

APR 0 1 1998

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bcc:

Margaret Halley (2DECA-RCB)

Hannah Maciejko (2DEPP-RPB)

Carl Plossl (2DECA-RCB)

*

3 - 1

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MAY 21 1998

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

RE:

Second Information Request Quality One Hour Cleaners

EPA I.D. Number NJD981489677/NJDEP I.D. Number NJX000316968

Dear Mr. Kesayan:

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EPA may require parties who handle or have handled hazardous waste to provide information relating to such wastes. EPA hereby requires that you provide the information requested in the Attachment to this letter. This information is necessary to determine the compliance status of Quality One Hour Cleaners.

Please provide the information requested no later than thirty (30) calendar days from receipt of this letter. Requests for additional time must be justified. Requests for additional time must be made within five (5) calendar days of receipt of this letter. The response must be signed by a responsible official or agent of your company.

The response in the Attachment must be mailed to the following:

Ms. Margaret Halley
RCRA Compliance Branch
Division of Enforcement and Compliance Assistance
U. S. Environmental Protection Agency - Region 2
290 Broadway, 22nd Floor
New York, NY 10007-1866

Failure to respond in full to this requirement may result in federal enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C., Section 6928.

If you have any questions about this letter, please call Ms. Margaret Halley at (212) 637-4133.

Sincerely yours,

Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc: Margaret Halley (2DECA-RCB)

Hanna Maciejko (2DEPP-RPB) Carl Plossl (2DECA-RCB)

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ATTACHMENT

The EPA has reviewed your response, dated April 19, 1998, to the first Information Request, dated April 1, 1998. Your response included a letter addressing question no.'s 1, 2, and 3; an invoice from APCON Environmental Services, Inc.; a laboratory analysis of the mineral spirits in the tanks, by International Petroleum Corporation of Delaware; and a Uniform Hazardous Waste Manifest for transport and disposal of the fuel oil by Prickett's Industrial Tank Cleaning Corporation.

Please provide responses to the following questions:

- 1. The sampled components include arsenic, cadmium, chromium, lead, PCB's and flash point.
 - a. Were the samples analyzed for total components or for the toxicity characteristic (Toxicity Characteristic Leaching Procedure)?
 - b. Why were these components the only oneschosen (for example, benzene may be a reasonable substance to analyze for, in addition to the ones which were sampled for)?
 - c. Was sampling for any other components conducted? If yes, please provide the results of analyses and identify the type of analysis conducted (i.e., TCLP).
- 2. In your response, you say that APCON disposed of the solvent. Where did APCON take the solvent? Please explain clearly and also include any documentation pertaining to the disposal. Also include additional shipping papers and/or manifests (which have not been submitted in your 4/19/98 response) for shipments of these petroleum solvents by APCON. Include applicable solid/hazardous waste transporter authorization numbers, including any EPA Identification numbers, for the transportors) and the facility(s) to which it was delivered (including address and applicable solid/hazardous waste destination facility authorization numbers).

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MAY 21 1998

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

RE:

Second Information Request
Quality One Hour Cleaners

EPA I.D. Number NJD981489677/NJDEP I.D. Number NJX000316968

Dear Mr. Kesayan:

The U. S. Environmental Protection Agency (EPA) is charged with the protection of human health and the environment under the Resource Conservation and Recovery Act, 42 U.S.C. Sections 6901 et seq.

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 - b. Why were these components the only oneschosen (for example, benzene may be a reasonable substance to analyze for, in addition to the ones which were sampled for)?
 - c. Was sampling for any other components conducted? If yes, please provide the results of analyses and identify the type of analysis conducted (i.e., TCLP).
- 2. In your response, you say that APCON disposed of the solvent. Where did APCON take the solvent? Please explain clearly and also include any documentation pertaining to the disposal. Also include additional shipping papers and/or manifests (which have not been submitted in your 4/19/98 response) for shipments of these petroleum solvents by APCON. Include applicable solid/hazardous waste transporter authorization numbers, including any EPA Identification numbers, for the transportors) and the facility(s) to which it was delivered (including address and applicable solid/hazardous waste destination facility authorization numbers).

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NJA 2596562 not sent to State (N) at least)

DATE: 08/06/98 TIME: 11:12:59

HAZARDOUS WASTE MANIFEST SYSTEM

TRANSPORTER / MANIFESTS

SCREEN: HWS1770

TERMINAL: #1L2

TRANSPORTER EPA ID: DED984073692

DATE SHIP: 960530

COMPANY NAME AND ADDRESS

INTERNATIONAL PETROLEUM CORP

505 S MARKET ST

WILMINGTON DE 19801

LINE NO	DATE SHIP	MANIFEST	GENERATOR	TSDF	WASTE	UNIT	QTY MORE
1	96-11-27	NJA1982609	NJD043274471	DED984073692	D001	177	1150
2	97-01-08	NJA2631372	NJD986609154	DED984073692	D001		2500
3	97-04-09	NJA2626932	NJD981556251	DED984073692	D001		550

SELECT LINE NO

DATE: 08/06/98 HAZARDOUS WASTE MANIFEST SYSTEM SCREEN: HWS1770 TIME: 11:22:40 TRANSPORTER / MANIFESTS TERMINAL. #11.2

TRANSPORTER EPA ID: DED984073692 COMPANY NAME AND ADDRESS

INTERNATIONAL PETROLEUM CORP

DATE SHIP: 960530 505 S MARKET ST

WILMINGTON DE 19801

LINE NO DATE	SHIP MANIFEST	GENERATOR	TSDF	WASTE	UNIT	QTY MORE
1 96-05 2 96-06 3 96-08 4 96-08 5 96-08 6 96-09 7 96-10 8 96-11 SELECT LINE N	6-27 NJA2570392 6-02 NJA2631201 6-16 NJA2077801 6-29 NJA1982601 6-06 NJA2631292 6-10 NJA2631321 6-26 NJA2631354		DED984073692 DED984073692 DED984073692 DED984073692 DED984073692 DED984073692 DED984073692	D001 D001 D001 D001 D001 D001 D001	G G G G G G G	2436 2625 2554 5985 1200 2294 2396 2800

DATE: 08/06/98 HAZARDOUS WASTE MANIFEST SYSTEM SCREEN: HWS1770 TIME: 11:22:40 TRANSPORTER / MANIFESTS TEDMINAL. #110

TRANSPORTER EPA ID: DED984073692 COMPANY NAME AND ADDRESS

INTERNATIONAL PETROLEUM CORP

DATE SHIP: 951228 505 S MARKET ST

WILMINGTON DE 19801

LINE NO	DATE SHIP	MANIFEST	GENERATOR	TSDF	WASTE	UNIT	QTY MORE
1 2 3 4 5 6 7 8	95-12-28 95-12-28 95-12-28 95-12-28 95-12-29 96-02-15 96-03-29 96-04-19	NJA2268108 NJA2268109 NJA2268147 NJA2268148 NJA2123912 NJA2268155 NJA2293374 NJA2570308	NJD981556848 NJD101425270 NJD981556830 NJD982179061 NJD982533382 NJD084011477 NJD986609154 NJD986609154	DED984073692 DED984073692 DED984073692 DED984073692 DED984073692 DED984073692 DED984073692 DED984073692	X721 X721 X721 X721 X721 X726 D001 D001	0000000	380 330 170 130 350 2075 2006 2485
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DATE: 08/06/98 TIME: 10:45:19 HAZARDOUS WASTE MANIFEST SYSTEM

GENERATORS / MANIFESTS

SCREEN: HWS1760

TERMINAL: #115

generator

EPA ID: DED984073692

DATE SHIP: 000000

COMPANY NAME AND ADDRESS

INTERNATIONAL PETROLEUM CORP

505 S MARKET ST

WILMINGTON DE 19801

LINE NO DATE SHIP MANIFEST NO TSDF

WASTE 1 UNIT 1 QTY 1 MORE

1 95-09-15 NJA2123917 NJD981133150 X726 G 4800

SELECT LINE NO

DATE: 03/10/98 TIME: 15:07:06 HAZARDOUS WASTE MANIFEST SYSTEM GENERATORS / MANIFESTS

SCREEN: HWS1760 TERMINAL: #2IR

EPA ID:

DATE SHIP:

NJX000316968

COMPANY NAME AND ADDRESS

930823

QUALITY CLEANERS 1406 S COLLINGS RD

CAMDEN NJ 08104

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1 UNIT 1	QTY 1 MORE
1	93-08-23	NJA1749990	NJD000768101	F002 P	105
2	93-09-14	NJA1731589	NJD000768101	F002 P	60
3	93-10-15	NJA1750653	NJD000768101	F002 P	120
4	93-11-15	NJA1842743	NJD000768101	F002 P	120
5	93-12-10	NJA1848755	NJD000768101	F002 P	120
6	94-01-13	NJA1802037	NJD000768101	F002 P	180
7	94-03-04	NJA1811140	NJD000768101	F002 P	120
8	94-04-26	NJA1823241	NJD000768101	F002 P	120
SELECT L	INE NO				

PF KEYS: PF3=MAIN PF5=CLEAR PF7=PREVIOUS PF8=NEXT PAGE PF10=END PROGRAM

3/10/96 As REQUESTED

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DATE: 03/10/98 HAZARDOUS WASTE MANIFEST SYSTEM SCREEN: HWS1760 TIME: 15:07:06 GENERATORS / MANIFESTS TERMINAL: #2IR

EPA ID: NJX000316968

COMPANY NAME AND ADDRESS

DATE SHIP: 940722

QUALITY CLEANERS 1406 S COLLINGS RD

CAMDEN NJ 08104

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1 UNIT 1	QTY 1 MORE
1 2 3 4	94-07-22 94-09-12 94-10-11 94-12-06	NJA1954749 NJA1956819 NJA1960180 NJA2059972	NJD000768101 NJD000768101 NJD000768101 NJD000768101	F002 P F002 P F002 P F002 P	120 195 120 120
5	95-01-04	NJA2042036	NJD000768101	F002 P	60
6	95-01-30	NJA2054980	NJD000768101	F002 P	60
7	95-03-02	NJA2062581	NJD000768101	F002 P	60
8	95-04-18	NJA1944536	NJD000768101	F002 P	195
SELECT I	LINE NO				

DATE: 03/10/98 HAZARDOUS WASTE MANIFEST SYSTEM GENERATORS / MANIFESTS

SCREEN: HWS1760 TERMINAL: #2IR

DATE SHIP: 950522

EPA ID: NJX000316968 COMPANY NAME AND ADDRESS

QUALITY CLEANERS

1406 S COLLINGS RD

CAMDEN NJ 08104

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1	UNIT 1	QTY 1 MORE
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3	95-07-18	NJA2157186	NJD000768101	F002	P	60
4	95-09-26	NJA2093657	NJD000768101	F002	P	60
5	95-11-15	NJA2247538	NJD000768101	F002	P	60
6	95-12-07	NJA2241575	NJD000768101	F002	P	60
7	96-02-02	NJA2235997	NJD000768101	F002	P	30
8	96-04-19	NJA2506612	NJD000768101	F002	P	195
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DATE: 03/10/98 HAZARDOUS WASTE MANIFEST SYSTEM SCREEN: HWS1760 TIME: 15:07:06 GENERATORS / MANIFESTS TERMINAL: #2IR

EPA ID: NJX000316968

COMPANY NAME AND ADDRESS

QUALITY CLEANERS

DATE SHIP: 950522 1406 S COLLINGS RD

CAMDEN NJ 08104

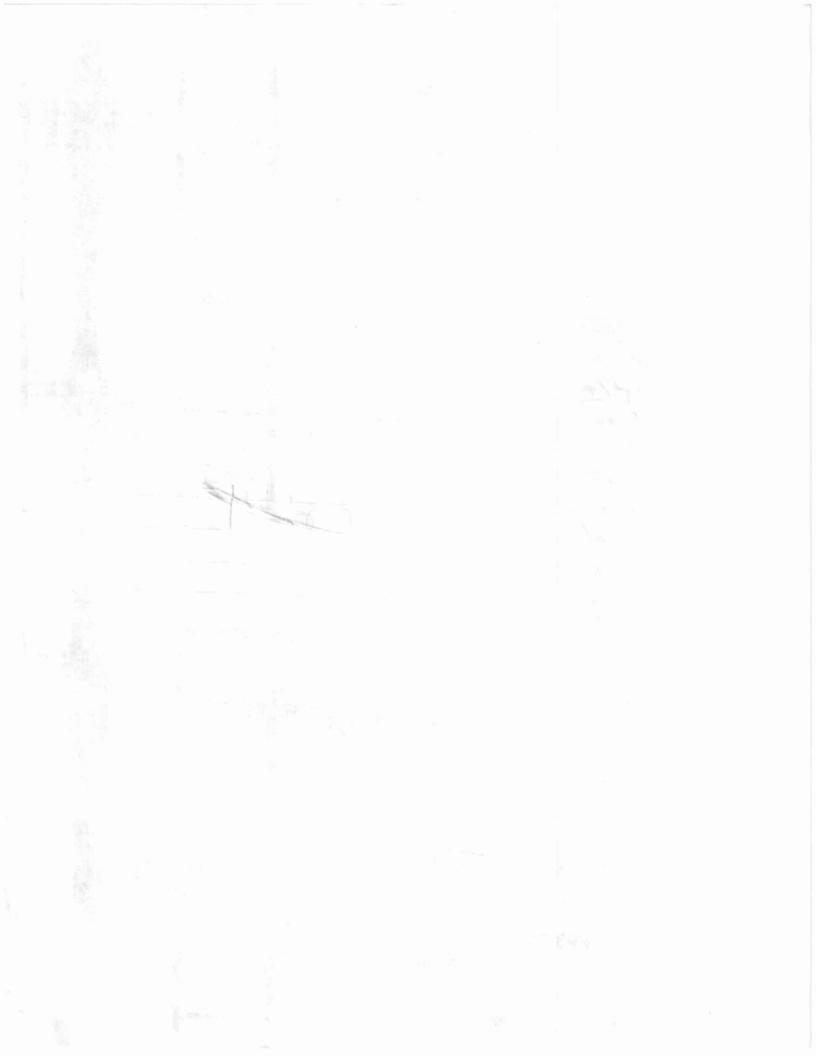
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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

RE:

Information Request

Quality One Hour Cleaners

EPA I.D. Number NJD981489677/NJDEP I.D. Number NJX000316968

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Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc: Margaret Halley (2DECA-RCB)

Hannah Maciejko (2DEPP-RPB)

Carl Plossl (2DECA-RCB)

ATTACHMENT

Pursuant to the hazardous waste regulations, specifically 40 C.F.R. Section 262.11, a person who generates a solid waste must determine if that waste is a hazardous waste either by applying knowledge of the waste or through an analysis of a representative sample of the waste. If knowledge of the waste, rather than analysis, is used to make a hazardous waste determination, the generator must be able to support its determination by documenting its knowledge of the waste. On the other hand, if the generator's determination is made by analysis, re-analysis is only necessary if the waste stream has changed.

EPA inspectors conducted a RCRA compliance evaluation inspection of your facility on January 14, 1998. During this inspection, you told the inspectors that "two summers ago," petroleum solvent waste, including sludge and water, were generated during tank cleanout and closure. You told inspectors that this cleanout was of two (2) tanks of five hundred (500) gallons each in capacity.

Please provide responses to the following questions:

- 1. What are the specific dates in which the petroleum solvents were generated?
- 2. How did your facility make a hazardous/solid waste determination for the petroleum solvents removed from the tanks? Please provide documentation, including any test results obtained from sampling and analysis.
- 3. What is the amount of the petroleum solvents that were sent off site? Please send photocopies of all manifest and/or shipping papers for shipments of these petroleum solvents. Include the name(s) of the transporter(s) (including address and applicable solid/hazardous waste transporter authorization numbers) and the facility(s) to which it was delivered (including address and applicable solid/hazardous waste destination facility authorization numbers).

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

DATE: 6/29/98

SUBJECT: Return call to Raffe Kesayan, Quality Cleaners, Camden, NJ

FROM: Margaret Halley

TO: My File

At ~ 9:00 am, I returned Raffe Kesayan's phone call to me, which he recorded on my voice-mail on 6/26/98. He had questions about the second information request letter. This is the second time he had called and left a message. When I returned the first call, I left a message with a person, but I didn't hear back from him.

He said he contacted APCON soon after he received the letter. APCON hasn't gotten back to him.

I said that he should contact them again and send in whatever response or not that he got from them. From there I told him over the phone that \underline{I} would follow up with \underline{APCON} .

He said that he FAX'ed APCON the letter from us. He said that he should have the letter out by the end of the week (7/3).

APCON (215) 947-8265

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

DATE: 7/22/98

SUBJECT: Call to APCON

FROM: Margaret Halley

TO: My File

At $\sim 9:45$ am, I called APCON ([215] 947-8265) to resolve this issue with Quality One Hour Cleaners, Camden. APCON FAX'ed me a response after Raffe Kesayan called them last week (I lost the FAX -- it should be around somewhere). APCON said in it that they contracted the job to International Petroleum Company (IPC). APCON supposedly is a broker. IPC did sampling and removal. TCLP was not done.

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DATE: 1722

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filters to remove buttons and other objects, lint, and insoluble particulates. The filtered solvent mix is then returned to the perc storage tank. Periodically, perc solvent mix is cycled through a distillation unit to remove non-volatile residues, such as oil, grease, and dye, from the perc. The muck is scraped off the filters and out of the still, by hand, into a fifteen (15) gallon metal drum. Safety Kleen picks up approximately one (1) container of filters every month. Perccontaminated cartridge filters are periodically removed from operation and placed in black rubberized Safety Kleen drums.

Perc and water are recovered from the dryer vapor streams by a refrigerant condensation process. The perc/water condensate drains into the separation unit. Perc is salvaged through settling and separation; perc is denser than water and somewhat immiscible, and the perc is returned to the perc storage tank. The residual perc-contaminated separator water goes to a five (5) gallon plastic pail by means of a plastic tube from the machine's separator unit.

Nonhazardous Waste Generation:

According to Mr. Kesayan, the laundry operation produces a non-hazardous waste stream including POTW wastewaters. Laundering washwater, soiled water and detergent is drained through a floor drain hooked up to the sewer.

Hazardous Waste Generation:

Hazardous wastes generated by Quality Cleaners include perc still bottoms (F002), muck filter wastes (D039), and any perc spill clean ups (F002 or D039).

1. The still bottom residues are generated in a distillation process employed to remove non-volatile residues, such as oil, grease, and dye, from the perc. The volatized perc is then recovered by the refrigerant condensation unit. Still bottoms are a RCRA hazardous waste (F002) under the derived from rule, 40 CFR § 261.3(c)(2)(i).

2. The muck filter wastes are generated by passing used perc extracted from the washing cycle through a series of external cartridge filters. Filter muck consists of perc contaminated buttons and other objects, lint, and insoluble particulates. This muck, along with the individual filter disks, are disposed directly as hazardous waste. Muck filter wastes are a RCRA hazardous waste (F002) under the derived from rule, 40 CFR § 261.3(c)(2)(i).

3Perc contaminated separator water results from the condensation of perc/water vapor streams from the drying processes. The perc solution is treated in a settling tank (Perc has a specific gravity of 1.62). The separator water remains contaminated with perc at the temperature dependent solubility limit (150 mg/L at 25°C). Separator water originating in perc/water vapor streams is a RCRA hazardous waste (D039) from the soluble perc (regulatory level = 0.7 mg perc/L). In normal operation, this perc-contaminated separator water was collected in a plastic bucket and disposed of by spreading over the surface of the facility's back asphalt-surfaced parking lot.

4. Perc spill clean up wastes are occasionally generated by the facility (D039 or F002). Generally though, spills are mopped up with old blankets or other absorbent textiles.

INDENT PROBLEM

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along with the individual filter disks, are disposed directly as hazardous waste. Muck filter wastes are a RCRA hazardous waste (FOO2) under the derived from rule, 40 CFR 261.3(b)(2)(i). 3. Perc contaminated separator water results from the condensation of perc/water vapor streams from the drying processes. The perc solution is treated in a settling tank (Perc has a specific gravity of 1.62). The separator water remains contaminated with perc at the temperature dependent solubility limit (1 50 mg/L at 25oC). Separator water originating in perc/water vapor streams is a RCRA hazardous waste (D039) from the soluble perc (regulatory level = 0.7 mg perc/L). 4. Perc spill clean up wastes are occasionally generated by most dry cleaning facilities (DO39 or FOO2). Generally though, spills are mopped up with old blankets or other absorbent textiles. The resultant saturated textile is placed in with a dry cleaning load, thus recovering most of the perc. 5. The discarded commercial product perc contained in holding tanks (U210) and perccontaminated process equipment (DO39) may be a hazardous waste.

Inspection Summary: Upon inspection the facility, we found it to be boarded up with a noticeable accumulation of trash around the building. A man, who identified himself as a neighbor, noticed us taking photographs and spoke with us. He said that the owner had simply sealed up the place and left it with everything, including customers laundry, still inside. We were able to get a partial view of the interior and saw large pieces of equipment in place. over the next day or so of area inspections, several dry cleaners said that the owner of Juliani had attempted to sell the business, the equipment, and anything else to his competitors last summer.

Follow up: on 25 February 1998, we spoke on the telephone with Jack Skoviak, NJDEP Compliance and Enforcement Southern Region Chief, about Juliani. Mr. Skoviak accepted the referral and told us that they would visit the facility and keep us informed.

Anachments: RCRIS report on facility, NJ State Checklist, and RCRA Notification.

DATE

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SENIOR INSPECTOR

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State of Mew Jersey between Protect

Department of Environmental Protection and Energy
Manifest Section

CN 028, 401 East State Street

Trenton, New Jersey 08625-0028

"Request to Deactivate EPA ID Number"

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Submission of false information is a violation of M.J.A.C. 7:26-5.6 and M.J.A.C. 7:26-7.8.

Yellow - USEPA Region II

copies: White - Manifest Section

HMK-001

State of New Jersey
Department of Environmental Protection and Energy
Manifest Section
CN 028, 401 East State Street
Trenton, New Jersey 08625-0028

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RCRA INSPECTION REPORT: Quality Cleaners (NJD981489677) 1406 Collings Road, Camden, NJ 08104

Junior Inspector: Carl Plossl, Environmental Engineer Lead Inspector: Margaret Halley, Environmental Scientist

Date and Time of Inspection:

14 January 1998

EPA Handler ID #:

NJD0111 S0752

NJX

Reason for Inspection:

Dry Cleaners Initiative

Type of Inspection:

Compliance Evaluation Inspection

Attendees:

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Margaret Halley, USEPA Region II DECA-RCB, (212) 637-4133 Carl Plossl, USEPA Region II DECA-RCB, (212) 637-4137

Background: Juliani Cleaners was a full service dry cleaner located in the Environmental Justice area of Camden City which notified EPA as a RCRA small quantity generator (SQG) in December of 1985. The facility manifested waste, as recorded in the NJ Manifest System, from January through March of 1991. No further activity was noted until December of 1996, when 1115 lbs of FOO2 waste was manifested.

From a review of the limited manifest information and from a comparison to competing facilities, Juliani Cleaners was most likely a RCRA Conditionally Exempt Small Quantity Generator (CE-SQG). Presumably, the facility listed themselves as an NJX facility with the state and ceased employing the manifest system. The single large shipment in December of 1996 may have been a result of a dry cleaning machine replacement (as Broadway one Hour Cleaners did). In February of 1997, NJ State inspected the facility under RCRA, finding no violations.

Facility operations: Juliani Cleaners has curtailed all operations. The facility is boarded-up and has been, according to neighbors and competitors, since the summer of 1997. According to Richard Avedissian, owner/operator of Crystal Dry Cleaners, Juliani Cleaners was unsuccessful in selling their business or equipment and just walked away. This is consistent with was neighbors had told us while we were inspecting the site.

Hazardous Waste Generation: Hazardous wastes generated by Juliani Cleaners while in operation included perc still bottoms (FOO2), muck filter wastes (FOO2), perc separator water (DO39), and the perc spill clean up (FOO2 or DO39). Since the facility ended all operations, the perc stored in the machines may also be a hazardous waste. 1. The still bottom residues are generated in a distillation process employed to remove non-volatile residues, such as oil, grease, and dye, from the perc. The volatized perc is then recovered by the refrigerant condensation unit. Still bottoms are a RCRA hazardous waste (FOO2) under the derived from rule, 40 CFR 261.3(b)(2)(i). 2. The muck filter wastes are generated by passing used perc extracted from the washing cycle through a series of external cartridge filters. Filter muck consists of perc contaminated buttons and other objects, lint, and insoluble particulates. This muck,

RCRA INSPECTION REPORT: Juliani Cleaners (NJD011150752) 1327 Haddon Ave., Camden, NJ 08103 Francisco State Control of State Control

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Facility Name:	ielity Cleaners	
Facility Address:/	406 S. Collings Ave	
	States or disc socialism of sou, on of crete or figures in a ork	
_	Distressed regalation - units althy, discolorer, or fould.	
Facility ID No.: NJ	X 000 316 968 old NJD 981 489	677
Facility Contact:	tesayes	
Facility Phone:	Shear on surface is	
Inspector's Name:	HEGH IN COLU	
Inspector's Phone:	Division/Branch:	7 .
Date of Inspection:	Cimultini, and visit at City at the Village of Village	
	. The state of the	
Referred to :	Date: No side of the second of	
Date Response Receive In Compliance: Yes		
If Yes: Violation Resolv Action Taken (des	ed	.3
	Hote surport of stant that sopears to be involved. - Note the locator.	
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Form Revised 6/12/96

Algo has a mineral spirits machine

INSPECTORS' MULTI-MEDIA CHECKLIST

GENERAL VISUAL CUES OF POSSIBLE NONCOMPLIANCE WARRANTING FURTHER INQUIRY

- Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.
- 2. Stains or discoloration of soil, concrete, or floors in work areas.
- 3. Distressed vegetation unhealthy, discolored, or dead.
- 4. Dark smoke or dust clouds, or smoke coming from other than a smoke state
- 5. Unusual odors or strong chemical smells.
- Sheen on surface waters.

CHECK IT OUT!

- 1. If you see or hear something suspicious during an inspection, check it out! As! probing questions:
 - What is it? Is it a waste product?
 - What process produced it?
 - Has it been tested?
 - Where do you normally dispose of it?
 - Do you have a permit for the disposal?
 - How long has the circumstance existed?
 - When did it begin?
- 2. Pay attention to the situation.
 - Note amount of pollutant that appears to be involved.
 - Note the location.
- Take notes describing the situation, noting the source of the pollutant and its emission point.
 - Take photographs.

PROGRAM-SPECIFIC QUESTIONS

Refer to program-specific questions in Attachment A appropriate for the facility you are inspecting.

REPORTING POSSIBLE NONCOMPLIANCE

Throughout this checklist, there are YES/NO questions. If you place an answer in a field marked with an asterisk (*), this means you should promptly refer the matter to the appropriate Region II program office. After you return from your inspection, immediately let your supervisor know that you observed possible noncompliance in another program area during your inspection. The information should then be referred to the appropriate Section Chief listed on Attachment B.

ATTACHMENT A - FOLLOW-UP QUESTIONS

· RCRA

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), do not complete this form but enter the facility's EPA ID number here

Ask		Paccardant and the street and the st
1 .	A .	Has the facility determined that it generates hazardous waste? YESNO
	97	If NO, skip Questions 2 to 8 and go to Question 9. If YES continue:
	B. ,	If the facility generates or transports hazardous waste, what is its EPA ID Number?
		[If the facility cannot produce an ID Number, *REFER*.]
2.	A .	Are there containers or tanks which hold hazardous waste? YES
^	10	Restricted from the state of a sent state of the state of
		If NO, go to Question # 3. If YES, continue:
	. В .	Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date? YESNO*
	C.	Do hazardous waste storage tanks have secondary containment systems (i.e., berm, vault, double wall tank)?YESNO*
	D.	Does the facility store hazardous waste in containers or tanks for longer than 90 days? YES*NO
3.	Does	the facility store, treat or dispose of hazardous waste in language pits piles

	or land	dfills?	YES* _	NO	
4.	Does neutra	the facility treat hazard alization or other mean ?YES	s to change the phys	ration, precipitati sical or chemical	on, nature of the
5.	off-site	the facility accept haze locations (including ofNO	ardous waste for trea off-site facilities owne	itment, storage o	r disposal from ompany)?
6.	Does 1	the facility maintain co	ppies of hazardous w	aste manifests o	n-site?
		contribute to the second	RCRA, Continued	·	•
7.	contai	ere any indications the iners or tanks) are poo dous waste to the env	orly maintained and n	storage or treatm may cause the re	ent units (<u>i.e.,</u> lease of
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				YES*
'	10	ratio with a respective with			
8.	enviro	ere any indications the enment through improper arges?	at chemicals or waste per handling, leaks, s YES*NO	es have been dis pills, dumping or	charged to the other
9.	A.	Does the facility clair excluding office papeYES*NO	n to generate non-ha er wastes, cafeteria w	zardous process /astes, etc.)?	wastes (<u>i.e.,</u>
	If NO,	go to Question 10. If	YES continue:		
	В.	What type of non-hat treatment sludges, as			lle? (<u>E.g.</u> ,
		900		40, or well.	
		reprincipante de la company			44
				\ 11	
		resident gebruik	_ 뭐. · · · · ·		
	C .	Very briefly describe Question 9B.	the process(es) that	generate the wa	astes in
		Tgal th treate appoin	78/1/ in headler	Curry serve,	The same of the

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 What kind of petroleum product or hazardous substance does UST containable. Is there any evidence of UST leakage/spillage?		0001	TO SHOW IT IN THE PARTY IN
disposal practices have resulted in environmental damage or pose the threat of such damage? RADIATION Ask: 1. Are any radioactive materials used or stored at this facility? NO 2. If YES, does the facility have a state or federal radiation license? YESNO* UNDERGROUND STORAGE TANKS (UST) Ask: 1. Does the facility have regulated USTs?YESNO [A regulated UST has more than 10% of tank volume, including piping, loc underground; and contains petroleum products or hazardous substances defined under CERCLA). Note: USTs containing fuel oil for on-site heatin exempt from UST requirements.] If YES, ask: 2. Are the USTs registered with the State?YESNO* 3. What kind of petroleum product or hazardous substance does UST containal to the state of the following schedule: Is there any evidence of UST leakage/spillage?YES*NO* 5. When was the UST installed?		Mac k	1970 - 1974
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Installation Date Leak Detection By December of—	3.	What kind of petroleum product or haza	ardous substance does UST contain
	3. 4.	What kind of petroleum product or haza	pillage?YES*N
	2. 3. 4. 5.	What kind of petroleum product or haza Is there any evidence of UST leakage/s When was the UST installed?	pillage?YES*N
	3. 4. 5.	What kind of petroleum product or haza Is there any evidence of UST leakage/s When was the UST installed? All USTs must have leak detection acco	pillage?

	Before 1965 or unknown 1965 - 1969 1970 - 1974	1 989 1 990 1 991	
	1975 - 1979	1992	
	1980 - Dec. 1988	1993	
	All USTs installed after December detection.	nber 1988 must currently be equipped with	
		le monitoring wells (water or vapor), m, interstitial monitoring, manual tank lus tank tightness testing.	
	me form of leak detection in use dule) to have it?	for every UST required (based on aboveYESNO*	
	equired records available on-site ction)?	e (<u>e.g.</u> , documenting registration and leak YESNO*	
	A	IR .	
		rce Compliance	
	sun <u>BEHIND</u> you, observe: Is estack, vent or opening?	opaque smoke being emitted from aYES*NO	
behin smok behin obsc	nd the plume for five minutes or the trails off.) The sun (if not observer. Please note w	am – dark enough to obscure anything more. (Steam dissipates at a given point; cured by clouds) should be in a 140° arc thether sun was obscured; if sun was not one of the sun, the observer and the	t
If YE	S, ask:		
A	Which process or process line specific, <u>e.a</u> , "Boiler No. 4" or	e is smoke coming from? (Try to be "Coating Line C").	
B . ,	What is the cause of the smok	ke emission? <u>E.g</u> .—	
. *		rol equipment out of service or turned off oing?YESNO	
	ii. If YES: When will it be	back on line?	

7.

8.

1.

2.

iii. Is the facility operating under an unusual load, using different fuels,

•			or process feed materials?YES	NO sca	
	C.	Note	color of smoke:		
3.	A		the facility added any processes or expenses in the last two years?YES		kisting
	В.		S: Did the facility obtain any state or feexpansion? YES	deral air pollutior NO*	permits for
4.	A .		the facility have any coating or printing	operations?	YES
	В.	If YE	S: 3 പ്രെത്രനാട്ട് പുരുത്തില് മുറേച്ച് ഇ	a Air Conditionin	
		·II.	Are the coatings or inks used:was solvent-based?	ater-based or	
		i.	If solvent based, are all process lines formulations in use which comply withYESNO*		
		iii.	What are the principal solvents or che process lines?(Ask for copies of MSDS, if available.	n venting	ls used in
5 .	Obs	erve: A	are there strong solvent odors at the fac	cility?	
aci	NO	nt (intern	ryleing, repairing, ar disposing of soutpr	resignation en	YES
6.7.	197	stos?	cility emit any of the following pollutants	s: mercury, beryll	ium, lead or
7 8.	Α.	Does	the facility emit, or use in its processes chloride or benzene?	YES*	NO
	(B .(0))	If YES	S: From which process lines?. Does the facility check for leaks on su	uch process equi	bra bra oment?
8.3	A.	Has t	YES 10.	or demolitions du	

		aspestos-containing materials?YESNO
	If YES	S: • • • • • • • • • • • • • • • • • • •
	B.	Approximately how many square feet or linear feet of asbestos-containing materials were removed?
, I - 1	C .	If the amount exceeded 260 linear feet, or 160 square feet, *REFER* to Air program office, and Ask: was EPA notified of removal? YESNO*
		CFC MULTI-MEDIA CHECKLIST QUESTIONS
Motor	Vehicl	e Air Conditioning Recovery/Recycling Compliance Program
1.	A.	Does the facility perform servicing for motor vehicle air conditioners? YESNO
	B .	If YES: number and agree of que a substitute of
•		 Does facility have Recover/Recycle or Recovery only equipment? YESNO*
Prohil	oition o	on venting -
2.	A .	Does the facility have any air conditioning/ refrigeration equipment or industrial compressors, which their employees perform service on (i.e. maintaining, servicing, repairing, or disposing of equipment) involving the refrigerant? YESNO
	В.	If YES:
		 i. Does facility have Recovery/Recycle or Recovery only equipment? YESNO*
	o 1 .	WATER
		ONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PRE-TREATMENT/UNDERGROUND INJECTION CONTROL (UIC)
1.	manu	erve/Ask: Does the facility dispose of any wastewater (e.g., from its facturing processes, wash water or other industrial wastes)? ESNO

2.	 If yes: Does the facility discharge wastewater into a receiving stream? NO 	aYES	
	 municipal sewer (sanitary or storm) system? 	YESN	0
	 subsurface disposal system (septic system, drywell or cesspool)? NO 	YES	
	As applicable, ascertain the name of the stream or s	sewer system.	
3 .	An NPDES permit is required for discharge to a water permit is usually issued by the municipality authorizing sanitary sewer system; and a UIC permit is required Does	ing the discharge to a for subsurface dispo	ì
4.	the facility have a permit for each discharge? Does the facility treat wastewater prior to discharge?	resNo* ?	
	NO	Y	ES
5.	Observe:	uano e e sinerem está. A principio de está (a.	
7 .	a. Is the effluent from the wastewater treatment facilities clear and free of solids?	YESN	0*
	b. Is equipment clean and well maintained?NO*	YES	
	c. Are there any unusual odors?NO	YES*	
6.	Ask: Is the effluent currently in compliance with the the permit, or the terms of an administrative or judiciYESNO*	al compliance order?	ed in
7.	Observe/Ask:	in the second and the second s	
	a. How are waste fluids disposed of?	Tudija vi sam Ja	
	b. Does the facility have floor or storm drains?	_YESNO	
	If YES:		

Is there fluid in the drains? Is there evidence (staining, etc.) of fluid entering drains? Are storm drains situated so that they could receive spills from truck loading accidents, etc?

	c. Does the facility operator indicate, or is there any evidence that any wastewater, or wastes/spills go into drains?
N	YES*
B. ST	ORM WATER
1.	Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water If yes — a) Is the storm water conveyed to a (1) treatment facility, (2) combined sewer, (3 separate storm sewer, or (4) surface water?
2.	Are the storm water discharges covered by a permit or has the discharger applied for a permit?
3.	Are materials stored outside? If yes — a) Are materials (1) stored in sealed containers, under tarps or roofs, or (2) are they open to contact with precipitation? (b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff?
	PUBLIC WATER SUPPLY
1.	Observe/Ask: Does the facility have its own water supply (i.e., a well)? YESNO
2.	If YES: Does the facility provide potable water for 25 or more persons? YESNO
3 .	If YES: Is the facility sampling and analyzing for contaminants in its water supply and reporting the results to the state? YES
N	10*
E	MERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)
	EMERGENCY PLANNING and COMMUNITY RIGHT TO KNOW
ASK	•

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Perk- 37-921 . march 97

1.	. A .	Does the facility have present any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities? YESNO
. 4		[Threshold planning quantities are established by regulation, vary by chemical, and range from 1 lb. to 5000 lbs.]
	В.	If YES: Was the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) notified of their presence for local planning purposes? YESNO*
2.	A.	Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity? YES*NO
*		[Reportable quantities vary by substance, ranging from 1 lb. to 5000 lbs. For the purpose of this checklist, assume 1 lb.]
	B.	If YES: Was notification of the release provided?
1	4O*	YES
	C.	If YES:
	- SIV	- M. Callino C. Salar Call S. Call C. Salar Call Call Call Call Call Call Call
		i. To whom was the notification given?
		ii. Was notification oral or written?
		iii. If oral, was a written, follow-up report submitted?
^	10*	YES
*	32.0	[If facility cannot identify to whom notification was given, cannot specify whether notification was written or oral, or is not certain whether oral notification was followed by a written follow-up report, *REFER*.]
3.	A. ble	Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard?
, C	В.	If any hazardous chemicals are present in excess of 10,000 lbs., or Extremely Hazardous Substances are present in excess of the threshold planning quantities, have the MSDS (or a list of MSDS), along with chemical inventory forms, been submitted to state and local emergency

planning	authorities	and t	lhe	local	fire	depart	ment?
YES	NO*				•		

EPCRA, Continued

	TOXIC RELEASE INVENTORY (TRI)
Ask:	Full time: 3 fam. 1
1.	Does the facility have 10 or more full-time employees?
N	OYES
2.	Is the facility classified under SIC codes 20 through 39?
	—YES NO
	If the response to either 1. or 2. is "NO," no further questions are required.
3.	If both 1. and 2. are YES:
	Did the facility use more than 10,000 lbs. of a chemical during a previous calendar year (starting with 1987)YESNO
4.	If YES:
	Did the facility file a Section 313 Toxic Chemical Release Inventory Form R for the chemical? YESNO*
office	nore EPCRA information, call 1-800-535-0202; or the Region II program es for EPCRA-Emergency Planning and Community Right To Know at 321-6194 or for EPCRA-Toxic Release Inventory at 908-906-6890.

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TOXIC SUBSTANCES CONTROL ACT (TSCA)

ASK.		THE THE GOOD OF BUILDING A REST OF BUILDING A REST OF BUILDING AND A
1.		Does the facility use electrical equipment that contains polychlorinated enyls (PCBs) (excluding small capacitors and florescent light ballasts)? /ES*NO
	В.	IF YES:
•		i. How many oil filled electrical transformers does the facility have?
	N 1911	ii. How many PCB Transformers does the facility have (transformers which contain PCBs at concentrations of 500 ppm or greater)?
2.	A.	- Does the facility have any high temperature hydraulic systems? YESNO
	B.	If YES:
		i. Have PCBs ever been used in these systems?YES*NO
		ii. What is the current PCB concentration in these systems?
3.	A.	Does the facility have any oil filled heat transfer systems?YES
N	O B.	If YES: THE PERSON OF A POST AND
		i. Have PCBs ever been used in these systems?
N	0	YES*
		ii. What is the current PCB concentration in these systems?
4.	A.	OBSERVE PCB Items (transformers, capacitors, containers)
		 Are any leaking? Do all have a PCB label? NO*
5	A.	ASK: Does the facility have a PCB storage for disposal area? YES*NO
	В. •	If YES, OBSERVE the PCB storage area. Does it have -

		 PCBs stored for disposal in it? a roof and walls to keep out rain? a 6" high impervious containment berm? a PCB label? NO* 	
N		Is it in the 100-year flood plain? Do all items show the date "removed from service for disposal"? YES* YES* YES* YES*	
		TSCA, Continued	
6.	comme	Does the facility manufacture or import into the United States "new ercial chemicals" [i.e., chemicals which were not previously manufactured apported into the United States]?	ť
N	0	YES*	
,		Specific information on such chemicals is protected by TSCA as ential Business Information, and should not be obtained.]	
		SCA information, call the TSCA Assistance Office in Washington at a or the Region II TSCA program office at 908-321-6759.	
SI	PILL P	REVENTION, CONTROL AND COUNTERMEASURE (SPCC)	
Ask:		40 CFR Part 112.1-112.7 215-92 USST	
1.	A. 2	Does the facility store oil?	
		Oil is not limited to petroleum oil; for example, vegetable oil and ormer oil are regulated oils.]	
	В.	If YES, does the storage capacity exceed —	
-		i. 660 gallons in any one above-ground tank?YES*NO ii. 1320 gallons in all above-ground tanks?YES*NO iii. 42,000 gallons in underground tank(s)?YES*NO	

"- event in the Grands againsts 80% on, a section of the "

show yo	ou a copy, or	have available C) Plan?	a Spill Pre	vention, Conti	rol, and	
NO*					nere any e YES	_YES
3. Did 1	he facility h	ave an oil spill w	rithin the la	st 12 months	? :39	Y M
NO			Speakstret:		When wa	_YES*
		Facility Re	sponse Pl	an (FRP)		
		40 0	CFR Part 1	12	*.	
equal to 42	,000 gallons	ve an above-gro and conduct vessels?	und oil sto	rage capacity	that is greatenclude over-v	er than or vater
••	Yes*					
2) Does th million gallo	e facility hav	ve an oil storage	capacity g	reater than	or equal t	o one
1837-33	Yes*	No				
3) Did the	facility subm	nit a Facility Res	ponse Plar	to the EPA?		
	Yes	No		*		
		. WI	ETLANDS	3 -		
1. Obse	rve:					
A .	the site, w	any wet areas (<u>i.</u> ith or without we sedges?YE	tlands-type	vege-tation	ogs) on or ac such as catt	djacent to ails,
need	not be stand	eral common we ding water in ord ne wetlands have	der for an a	rea to be des	ignated a fed	there deral
B.	Are there a	any waterbodies NO	or waterwa	ays on or adja	ecent to the s	ite?

2.	ditchir or is t	wer to # 1. A or B was "YES," is there any work (clearing, filling, dredginging, construction on or over the area, etc.) being conducted in these areas here any evidence that such activities have occurred very recently? SNO
3.	H YES	Single of the state of the stat
	A	When was the work undertaken?
	B.	Does the facility have any permits for this work?
N	0 *	
4.	If YES	
.*	Α.	What agency(s) issued such permits?
	B .	For any federal permits, what specific type of permits are they (i.e. nationwide, regional, individual)?

If facility is unable to provide adequate information in response to # 4., *REFER* to program office.

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FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT

FIFRA

If the inspection is conducted at a manufacturing facility, ask the following:

The formal state of the same and the same that the same the same and t	
A. Are there any pesticides manufactured, relabeled, or is establishment?	repackaged at
YES NO	
(Pesticide is (1) any substance or mixture of tended for preventing, destroying, repelling, est, or (2) any substance or mixture of substances plant regulator, defoliant, or desiccant.)	substances or mitigating any s intended for use as
B. If YES, continue:	
Does the establishment have an EPA Establishment ST. #)	Number? (EPA
YES NO*	
(Section 7 of FIFRA requires all establishments labeling and/or repackaging pesticides be registered with EPA.)	producing,
C. If Yes, enter the Establishment Number here and continue:	
D. Has the company filed the Annual Pesticide Production Report form?	
YES NO*	
(Report is due on March 2 of each year for the previous year's production.)	
(interest pl	Pesticide is (1) any substance or mixture of ended for preventing, destroying, repelling, it, or (2) any substance or mixture of substances ant regulator, defoliant, or desiccant.) B. If YES, continue: Does the establishment have an EPA Establishment T.#) YES NO* (Section 7 of FIFRA requires all establishments beling and/or repackaging pesticides be registered with EPA.) C. If Yes, enter the Establishment Number here and continue: D. Has the company filed the Annual Pesticide Production Report form? YES NO* (Report is due on March 2 of each year for the previous

If the inspection is conducted at a storage-distribution facility or at a retail facility, ask the following:

2. A. Are there any pesticides being held for sale, distribution stored at this facility (warehouse)?	on, or
YESNO	
B. If YES, continue:	
Are there any restricted use pesticides stored, or held for distribution, sale at this facility?	
YES NO	
C. Are there any containers leaking?	
YÈS*NO	
D. Are pesticides stored next to strong acids, mineral acids, and/or oxidizing materials?	caustic
YES*NO	
pesticides were not properly used, observe and record any visible adve effects such as human adverse reaction(s), fish kill, dead birds, dead with plant damage, etc, and ask the following:	
3. A. Have pesticides been applied by you (or by an employee of your company or by a pesticide application company?	
YES*NO	
B. If YES, continue obtaining the following information:	
~ Z fines / year - Date of application, - Name of pesticide applied,	
	•
 Name of pesticide applicator company (if applicable) in your company who made the application, 	or person
- Address and/or phone number of pesticide applicator	company
(if applicable),	
609-428-8065 penticides	
609-400 perticides 17-	

- Type of health complaints from employee (if - Contact person for follow-up.

applicable)

REFER to Program Office if you check an answer marked with *.

CRIMINAL ACTS

During the course of this inspection, has anything been brought to your attention which would indicate the following:

° 1.	Is the facility involved in deliberate acts of dumping or discharging wastes?
	Yes*No
2.	Is there any evidence of bad intent or conduct? For example, falsification or records or efforts to conceal activities?
3.	Yes* No Has there been any actual harm to individuals as a result of violations
	Yes*No
4.	Other activity or behavior which you believe indicates criminal behavior?
2	Yes* No
Refer to Cri	minal Investigation Division if you checked Ves

Revised, 8/96.

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MEMORANDUM

Com to Stol

To:

Joel Golumbek

From:

Margaret Halley

Re:

Quality and Atlantic Cleaners' Response Reviews

Date:

May 12, 1998

Quality Cleaners (NJD981489677/NJX000316968):

The response is confusing. Both waste oil (NJ DEP waste code X722) and Stoddard solvents were removed from the facility's two tanks. The response indicates that APCON Environmental Services, Inc. (2569 Huntingdon Pike, Huntingdon Valley, PA 19006), transported and disposed of approximately 660 gallons (12 drums) of Stoddard mineral spirits. The o/o provided an invoice and stated in his letter that APCON disposed of the mineral spirits. APCON claims the waste is non-hazardous. The laboratory analysis, done by International Petroleum Corp. (IPC) of Delaware, sampled for As,Cd, Cr, and Pb, and flash point. Cd, Cr, and Pb had hits, but flash point was > 140. Parts of the copy are illegible, so I don't find if these are totals or TCLP (it appears to be totals). Was IPC contracted to APCON or to the dry cleaner to do the analysis? Since the mineral spirits are from years ago, it would have been logical, also to sample for benzene, as well as perc. I am awaiting a call from EPA Region 3 as to whether APCON is a RCRA notifier. The hazardous waste determination appears to be inadequate.

To make matters more confusing, Prickett's Industrial Tank Cleaning Corp. (NJD071454276) manifested 600 gallons of X722 to themselves (copy attached).

We need to determine:

- 1. If samples are totals or TCLP?
- 2. Was sampling for any other parameters done?
- 3. What is IPC's relationship to APCON and/or the dry cleaner?
- 4. What did APCON do with the solvents?
- 5. Is APCON a RCRA notifier?
- 6. Did APCON give the waste to Prickett to handle?
- 7. Why does Prickett manifest X722 waste to its own facility?

Although many items do not corroborate, the o/o appears to be trying to comply, but doesn't have the resources, apparently, to determine if the contractor(s) is in compliance himself.

I recommend a second § 3007 to Quality to clarify these issues, with follow up to APCON concerning this company's potential violations (ourselves or referral to Region 3).

Atlantic Cleaners: NT

Acceptable. In addition, the o/o asks for suggestions from us as to how she can prevent and clean up perc spills. Following the NCA seminar on 5/20, where I want to get additional suggestions concerning perc spills, I recommend a qualified thank you letter with suggestions or outreach material relevant to her situation (that we haven't given her already).

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ners PHONE NO. : +609 962 7488 Jul. 16 1998 05:02PM PHONE ND. : +609 962 7488 Jun. 29 1998 01:03PM P02 FAGE OI IFO-DE 130545 4089 APRON MINERAL SPIRITE NO. J. PETROLEUM CORPORATION OF DELAWARE LABORATORY ANALYSTS 1141 gegradian Combiner COMPONENTS ARSENIC 1.741 CADHIUM CHROHIUM 13.1 LEAD 1111 P#P#41 PI/GEAVITE 280. ... TOTAL PROJECT 6.591 TOURDE I SE GAL BOL ... PCB'S FLISH BRAUT TRACE MATER TRACE SOFTOM SUMMERT PISCOSIFI, MINIMATED AT LOD TO VISCOSITA, SAME UNIVERSED AT ACCUAL SULFUR

AUG 2 0 1998

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

NOTICE OF VIOLATION

RE: Notice of Violation

Quality One Hour Cleaners EPA I.D. Number NJD981489677/NJDEP I.D. Number NJX000316968

Dear Mr. Kesayan:

This Notice of Violation (NOV) is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984 42 U.S.C. § § 6901, 6928.

Section 3006(b) of the Act, 42 U.S.C. § 6926 provides that the Administrator of the U.S. Environmental Protection Agency (EPA) may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the Federal program. The State of New Jersey received final authorization to administer its hazardous waste program in lieu of the Federal program on February 7, 1985. Section 3008(a) of the Act, 42 U.S.C. § 6928 authorizes EPA to enforce the provisions of the authorized State program.

Pursuant to HSWA, EPA has promulgated regulations since November 7, 1986, which prohibit the land disposal of restricted waste. These regulations are published in Title 40 Code of Federal Regulations (40 C.F.R.), Part 268, and amend various sections of 40 C.F.R. Parts 260-265 and 270. The authorized State program, however, does not include all provisions of HSWA, and regulations promulgated thereunder. EPA, therefore, retains primary authority to implement and enforce all regulations promulgated pursuant to HSWA, including the land disposal restrictions.

The following summary indicates issues that require correction:

In response to the EPA's first Information Request, dated April 1, 1998, Quality submitted information that appeared to confirm that APCON Environmental Services, Inc. (2569 Huntingdon Pike, Huntingdon Valley, PA 19006), transported and disposed of approximately 660 gallons (12 drums) of Stoddard mineral spirits. In addition, a laboratory analysis from International Petroleum Corporation of Delaware (IPC) (505 South Market Street, Wilmington, DE 19801), was provided. This laboratory analysis indicated that cadmium, chromium, lead, total halides, PCB's, and flash point were sampled and analyzed. It is unclear what two (2) of the other items sampled are because they are illegible (copy attached).

In response to the EPA's second Information Request, dated May 21, 1998, Quality submitted a letter from Adam Reiff, APCON Environmental Services, Inc., addressed to you and dated July 14, 1998. Mr. Reiff states that the information concerning the characterization of the solvent was based on information which you provided, "representing the material as mineral spirits." He also says that the material disposed of was sampled and analyzed by International Petroleum Corporation. He also states that "It appears as if no TCLP analysis was performed" (copy enclosed).

Margaret Halley contacted Micky Wenclawiak at Atlas Environmental Services and Equipment Company (6801 State Road, Bldg. A, Philadelphia, PA 19135) on July 27, 1998. He FAX'ed her a non-hazardous used oil manifest from IPC (copy enclosed). This manifest indicates that there exists a New Jersey State Manifest, but this manifest was not included. The number of this manifest is NJA2596562.

Based on the above information, Quality One Hour Cleaners is in violation of 40 C.F.R. § 262.11. 40 C.F.R. § 262.11. states the following: A person who generates a solid waste must determine if that waste is a hazardous waste.

When you hire an outside party to transport and dispose of the waste, you must insure that a hazardous waste determination is made (As you know, the waste must be removed although it was already on site when you opened your business.). It is appropriate to make a hazardous waste determination in one of two ways, by:

- (1) testing the waste; or
- (2) applying knowledge of the hazard characteristic in light of the materials or processes used.

Based on the information received, it appears as if no hazardous waste determination was made for the petroleum solvents. Unless knowledge of the spent solvent was sufficient to make a hazardous/non-hazardous waste determination, a Toxicity Characteristic Leaching Procedure (TCLP) test should have been run on the waste solvent prior to removal off site, in order to determine if any hazardous wastes were present. (TCLP components which could reasonably have been sampled include perchloroethylene, trichloroethylene, carbon tetrachloride, and benzene. This is because these chemicals are or were, in the past, used by dry cleaners, and because old Stoddard solvent may contain benzene.).

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The EPA requires you to find out where these Stoddard solvents were taken and their disposal site. Please obtain supporting documentation of this, including any Hazardous Waste Manifests. If additional testing was done subsequent to the transport of the waste, please provide a copy of this.

You must take immediate action to correct the violations described above. Within thirty (30) days of the receipt of this correspondence, please submit a response that includes: (1) a description of the actions you have taken to correct the violations noted above and (2) documentation that the violations have been corrected.

Your response to this letter must be mailed to the following addressee:

Ms. Margaret Halley RCRA Compliance Branch Division of Enforcement and Compliance Assistance U.S. Environmental Protection Agency - Region 2 290 Broadway, 22nd Floor New York, New York 10007-1866

Failure to respond in full to the above requirements is a violation of the RCRA and may result in federal enforcement action pursuant to Section 3008 of the RCRA, 42 U.S.C. Section 6928.

If you have any questions regarding this matter, please contact Ms. Margaret Halley at (212) 637-4133.

Sincerely,

George C. Meyer, P.E., Chief RCRA Compliance Branch

Enclosures

cc: Wolfgang Skacel, Chief

Bureau of Hazardous Waste Compliance and Enforcement

Central Field Office

New Jersey Department of Environmental Protection

bcc: Margaret Halley, HWCS/RCB

RCRA Files, 20PM/ISS

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AUG 2 0 1998

CERTIFIED MAIL RETURN RECEIPT REQUESTED

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d. 10

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Enclosures

cc: Wolfgang Skacel, Chief

Bureau of Hazardous Waste Compliance and Enforcement

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From:

MARGARET HALLEY

To:

JGolumbe

Date:

9/28/98 4:37pm

Subject:

Summaary of NOV response from Quality Cleaners, Camden, NJ

The NOV was issued 8/20/98 and cited the o/o (Raffe Kesayan) of Quality for failure to make a h.w. determination for the Stoddard solvent and to find out the disposal site, and documentation of nay additional testing. He submitted the

1. FAX'ed me letter (dated 9/1/98) from International Petroleum Corp. (IPC) of DE, to Kesayan, which stated that IPC removed non-hazardous product on 10/2/96. It was transferred to the Wilmington, DE, refining plant for processing. Attached was outline of procedure used in the treatment of the waste. All incoming waste is tested for acceptability before the co. truck is off loaded. In this case, IPC says there was no problem. The waste in question had been tested for Atlas Environmental before IPC picked up the material.

IPC's attached diagram covers only used oil, wastewater, anti-freeze and oil filters. Nothing is mentioned about mineral spirits.

- 2. On a used oil manifest under IPC's logo, the waste is identified as X726, which is "The following used & unused waste oils; turbine lubricating oils; diesel lubricating oils; and quenching oils.
- 3. IPC's identification contradicts Kesayan's (he said it was mineral spirits); thus, I am not sure of what this waste actually is. Evidence supports more strongly that it is waste oil because of sampling at IPC.

Recommendation:

Thank you letter to Kesayan, warning him that should he encounter a similar situation in the future, of a previously unidentified waste that he needs to ship off site, to follow the proper procedure of h.w. identification, etc.

RCRA INSPECTION REPORT: Quality One Hour Cleaners (NJD981489677) 1406 Collings Road, Camden, NJ 08104

Lead Inspector: Margaret Halley, Environmental Scientist

Newly Certified Inspector: Carl Plossl, Environmental Engineer

Date and Time of Inspection:

EPA Handler ID #:

14 January 1998

NJD981489677

NJX000316968

Reason for Inspection:

Dry Cleaners Initiative

Type of Inspection:

Compliance Evaluation Inspection

Attendees:

Margaret Halley, USEPA Region 2 DECA-RCB, (212) 637-4133 Carl Plossl, USEPA Region 2 DECA-RCB, (212) 637-4137

Ray (Raffe) Kesayan, Owner/Operator ("o/o"), Quality Cleaners, (609) 962-788

Background:

This facility is a dry cleaning, laundering, and tailoring operation which notified the U.S. Environmental Protection Agency (EPA) in June of 1986 as a RCRA generator. A review of their operation and of the limited records suggested a conditionally exempt status. On April 26, 1993, Quality One Hour Cleaners filed an application with the New Jersey Department of Environmental Protection and Energy (DEPE) for a conditionally exempt small quantity generator (ceSQG) identification number (NJX000316968) (photocopy attached). In the dry cleaning operation, the facility employs tetrachlororethylene (CAS 127-18-4), commonly called perc. The site has been a dry cleaner since 1928. Mr. Kesayan has had his business at this site for twelve years, having notified the EPA for an I.D. Number on June 3, 1986. The site itself has been a dry cleaner since 1928. Since 1987, he has operated a sixty-five (65) pound dry cleaning machine. It has not previously been inspected under RCRA. Water and air permits were not recorded in either the Permit Compliance System or the Aerometric Retrieval System.

Facility Operations:

Quality Cleaners offers a limited range of valet services including dry-cleaning, laundering, stain removal, mending, pressing, and finishing. There are two full-time employees. The facility is located in a one story building. The owner/operator (o/o) currently uses a 65 pound dry-to-dry fourth generation cleaning machine. The washer and dryer are one unit. Perc is reused through several recovery and recycling systems. Mr. Kesayan stated that the facility did generate hazardous wastes consisting of perc residues from a distilling unit and perc contaminated cartridge filters. Four filters are attached to the machine itself (Photograph 2.

men for

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RCRA INSPECTION REPORT: Quality One Hour Cleaners (NJD981489677) 1406 Collings Road, Camden, NJ 08104

In the dry cleaning operation, soiled clothing is loaded into the one washer/dryer unit, where perc is combined with detergent, mixed with the clothing, and the clothes and solvent mix are agitated by the rotation of the washer's drum. After washing, the soiled solvent mixture is extracted by centrifugal action. Warm recirculating air then volatilizes most of the remaining perc. The soiled solvent mixture from the wash cycle is pumped through the series of cartridge filters to remove buttons and other objects, lint, and insoluble particulates. The filtered solvent mix is then returned to the perc storage tank. Periodically, perc solvent mix is cycled through a distillation unit to remove non-volatile residues, such as oil, grease, and dye, from the perc. The muck is scraped off the filters and out of the still, by hand, into a fifteen (15) gallon black rubberized drum. Safety Kleen picks up approximately one (1) container of filters every month. Perc-contaminated cartridge filters are periodically removed from operation and placed in black rubberized Safety Kleen drums.

Perc and water are recovered from the dryer vapor streams by a refrigerant condensation process. The perc/water condensate drains into the separation unit. Perc is salvaged through settling and separation; perc is denser than water and somewhat immiscible, and the perc is returned to the perc storage tank. The residual perc-contaminated separator water goes to a five (5) gallon plastic pail by means of a plastic tube from the machine's separator unit.

Nonhazardous Waste Generation:

According to Mr. Kesayan, the laundry operation produces a non-hazardous waste stream including POTW wastewaters. Laundering washwater, soiled water and detergent is drained through a floor drain hooked up to the sewer. In the summer of 1995, the o/o contracted with Prickett's Industrial Tank Cleaning Corp. (PITTCO), 1940 Harris Drive, Deptford, NJ 08096 (609) 228-1071. This was in order to clean out the contents of two underground storage tanks (UST) and ship the waste off site. This included two oil tanks, one of 1,000 gallons and the other of 500 gallons in capacity. Mr. Kesayan told inspectors the UST's were registered with the State. The wastes generated include 600 cubic yards of used oil (X726), quenching oil mill, and 30 per cent waste. PITTCO took thirteen soil samples and three water samples. The 500 gallon tank had holes, but the 1,000 gallon tank did not. The o/o told inspectors that the tanks have been closed.

Hazardous Waste Generation:

Hazardous wastes currently generated by Quality Cleaners include perc still bottoms (F002), muck filter wastes (F002), perc separator water (D039), and the infrequent perc spill clean up



*

(F002 or D039).

- 1. The still bottom residues are generated in a distillation process employed to remove non-volatile residues, such as oil, grease, and dye, from the perc. The volatized perc is then recovered by the refrigerant condensation unit. Still bottoms are a RCRA hazardous waste (F002) under the derived from rule, 40 CFR § 261.3(c)(2)(i).
- 2. The muck filter wastes are generated by passing used perc extracted from the washing cycle through a series of external cartridge filters. Filter muck consists of perc contaminated buttons and other objects, lint, and insoluble particulates. This muck, along with the individual filter disks, are disposed directly as hazardous waste. Muck filter wastes are a RCRA hazardous waste (F002) under the derived from rule, 40 CFR § 261.3(c)(2)(i).
- 3. Perc contaminated separator water results from the condensation of perc/water vapor streams from the drying processes. The perc solution is treated in a settling tank (Perc has a specific gravity of 1.62). The separator water remains contaminated with perc at the temperature dependent solubility limit (150 mg/L at 25°C). Separator water originating in perc/water vapor streams is a RCRA hazardous waste (D039) from the soluble perc (regulatory level = 0.7 mg perc/L). In normal operation, this perc-contaminated separator water was collected in a plastic bucket and allowed to evaporate. Mr. Kesayan indicated that he periodically sends residual liquid off-site with his other hazardous waste.
- 4. Perc spill clean up wastes are occasionally generated by the facility (D039 or F002). Generally though, spills are mopped up with old blankets or other absorbent textiles. The resultant saturated textile is placed in with a dry cleaning load, thus recovering most of the perc.
- 5. Other possible system loses of perc include system vapor leakage and steam press and other volatization of residual perc contained in cleaned clothing.
- 6. Petroleum solvent waste, including sludge and water, was generated during the tank cleanout and closure in the summer of 1995. This was two tanks of 500 gallons each in capacity. Both tanks apparently had holes. The petroleum solvents were used two owners ago and indicated to inspectors that he did not use petroleum solvents himself. The removal of petroleum solvent waste took place over a couple of months, according to the o/o.

Safety-Kleen has contracted to handle all of the facility's hazardous waste transportation, treatment, and disposal needs. According to Safety-Kleen, the facility generates still residues (F002, D007, D008, D039, D040) and spent cartridge filters hazardous wastes (F002 & D039)¹.

Document Review:

A review of the available off-site shipment records indicated that this facility is a ceSQG of

¹ It is Safety-Kleen's policy to list all hazardous waste codes that have in the past been associated with dry cleaner perc still residues. This is not meant to suggest that this is an accurate representation of this facility's waste stream.

F002 and D039. Mr. Kesayan sends off one 15 gallon Safety Kleen container of filters each month, which was verified upon review of his Safety Kleen receipts. Mr. Kesayan provided inspectors with a New Jersey State manifest (NJA2596562) for the waste oil, which was shipped off on or about October 2,1996. He, however, was unable to provide manifest or other records verifying the disposal of the petroleum solvents. He indicated that a company other than PITTCO had removed the petroleum solvent waste.

Inspection Summary:

We met with the owner, Mr. Ray (Raffe) Kesayan. After identifying ourselves, we discussed the generator requirements under RCRA, the facility operations, and the nature of our inspection. We presented the owner with our plethora of dry cleaner and SQG compliance assistance material. At this point the we were taken on a facility tour by Mr. Kesayan.

The dry cleaning machine was located to the left of the facility. In the satellite accumulation areas, inspectors observed an uncovered five gallon white plastic pail used to collect separator water (D039) (Photograph 3) by means of a rubber tube leading from the machine's separator unit. The white pail was not labelled with the words, "Hazardous Waste." In addition, inspectors observed a an open metal container approximately one cubic foot in dimension, used to collect the perc still bottoms (Photograph 4). This was located adjacent to the machine. The o/o had not labeled this container with the words, "Hazardous Waste."

The operation was well ventilated. The hazardous waste storage area was located on the left side wall near the back of the store in the dry cleaning area. We observed two black rubberized 15 gallon drums. The drums were labeled as hazardous waste, but did not have accumulation start dates. The drums in use were sealed and easily accessible.

Observations:

No Material Safety Data Sheet (MSDS) was available for perc. The o/o buys 74 to 80 gallons of perc annually.

Observations:

The facility appeared to be a conditionally exempt small quantity generator.

The following specific violations and concerns were noted during the inspection:

Conditionally Exempt Small Quantity Generators Requirements - 40 CFR § 261.5:

1. 40 CFR § 261.5(g)(3) states that in order for hazardous waste generated by a conditionally exempt small quantity generator in quantities of less than 100 kilograms of hazardous waste during a calendar month to be excluded from full regulation, the generator may either treat or dispose of his hazardous waste in an on-site facility or ensure delivery to an off-site treatment, storage or disposal facility, either of which is:

Fire

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- A state or federally regulated hazardous waste management treatment, storage, or disposal facility (TSDF).
- A facility permitted, licensed, or registered by a state to manage municipal or industrial solid waste.
- A facility that uses, reuses, or legitimately recycles the waste (or treats the waste prior to use, reuse, or recycling).

A universal waste handler or destination facility subject to the universal waste requirements of 40 CFR Part 273. (Universal wastes are wastes such as certain batteries, recalled and collected pesticides, or mercury-containing thermostats.)

Because the o/o was not able to provide off site manifest or other shipping paper records for the petroleum solvent waste removal, the quantity and quality of hazardous waste generated during this time is not known. The same is true of the waste oil removal, which apparently is an "X" code waste regulated by DEP.

Enforcement Recommendation:

§ 3007 letter to requesting documents verifying waste code(s), date(s), disposer, and quantity of petroleum solvent waste shipped off site. Equivalent documentation should also be requested for the waste oil to verify its hazardous/non-hazardous status. The § 3007 letter should also include a request of documentation for sampling and analysis data. MSDS for perc should also be provided.

Attachments: Photographs (numbered and labeled), notification form, the DEPE's "Request to Deactivate EPA ID Number," form, and DEP print-out for manifests dated from 1/21/91 through 7/21/93 (using NJD981489677).

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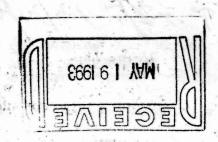
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Manifest Section CN 028, 401 East State Street Trenton, New Jersey 08625-0028

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EPA ID: NJD981489677

COMPANY NAME AND ADDRESS

QUALITY CLEANERS

DATE SHIP: 910121

1406 SOUTH COLLINGS RD

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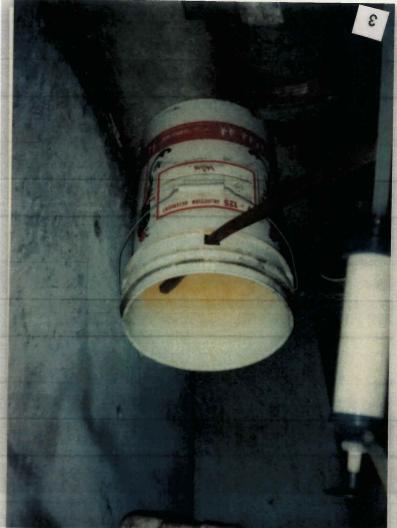
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4	93-06-25	NJA1657778	NJD000768101	F002	P	120	
5	93-07-21	NJA1754531	NJD000768101	F002	P	120	

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RE: Norte-mail hom Rafte Kescuyan, Quality Cleaners, Campen

Margaret Halley - EPA Record of Phone Conversations

I spoke to Icall Balle (Ray) Kusayan Phone # (609) 962-7488
Organization Qualing Cleaners, Canaden NS Title
Date 12/18/98 called
Call was for MH. This was a machine message 12:45p 12/19 I left a machine message : Quality Cleaners
l left a message with
Subject latter sent 11/27/98 (RCB's)
EPA I.D. #
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Quality's usponse to 2 mg logust

369 Huntingdon Pike, Huntingdon Valley, PA 19006 • (215) 947-TANK • 1-800-887-2222 • FAX 947-3959

July 14, 1998

Quality Cleaners 1406 S. Collings Road Camden, NJ 08104

ATT: Ray Kessyan

Dcar Ray:

We are in receipt of your fax regarding the transportation and disposal of mineral spirits and offer the following:

APCON Environmental Services Inc. contracted with International Petroleum Services through Atlas Environmental Services and acted strictly as a broker in this transaction. The information provided was based on that which you supplied to us, representing the material as mineral spirits. The material disposed of was sampled and analyzed by IPC as indicated on the laboratory analysis attached. It appears as if no TCLP analysis was performed as suggested in the Department of Environmental Protection's letter (question #1).

In response to question #2, attached is a copy of the manifest provided by IPC. We have no other information other than that provided.

If you need more information, you may want to contact IPC directly at (302) 421-9306.

Sincerely,

Adam S. Reiff

President

Attachment

qualitycleaners

201 DE 13 - 1 - 12

Phone (609)962-7488 Fax (609)962-7075

April 19, 1998

Ms. Margaret Halley RCRA Compliance Branch Division of Enforcement and Compliance Assistance U. S. Environmental Protection Agency - Region 2 290 Broadway 22nd floor New York NY 10007-1866

Dear , Ms. Margaret

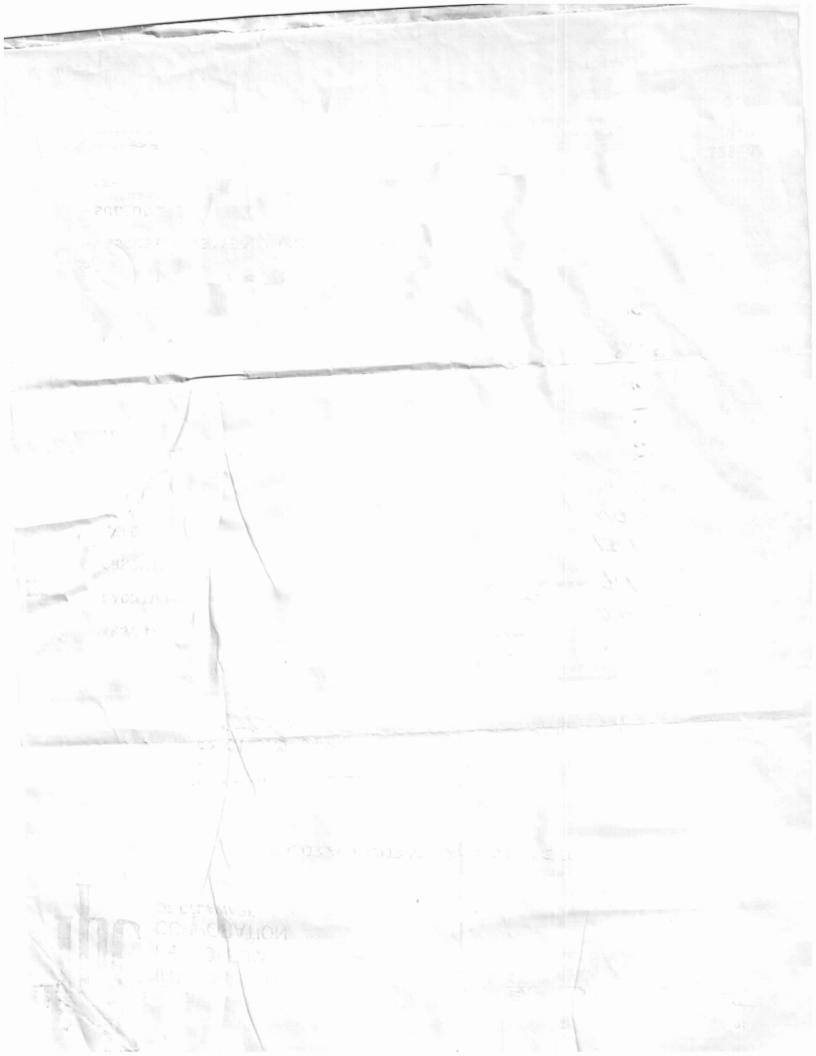
I Received your letter and I'm answering your questions best as I can. First of all, there's a correction, the (2) tanks were 1000 gallons not 500.

- Q. #1 The date was April, 8 1996
- Q. #2 PRICKETT'S INDUSTRIAL TANK CLEANING CORP. Removed the solvent APCON disposed the solvent INTERNATIONAL PETROLEUM CORPORATION did laboratory analysis
- Q. #3 660 gallons. I'm sending all asked information in Q.#3 if you have any questions don't hesitate to call.

Sincerely,

RAFFE KESAYAN

LITTENO SHOW COLLINS AVEUS 9928-ZF6 (512) 90061 V4 (13006) the special Services, in SCIPANI



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AND CONTROL OF THE PROPERTY OF THE PERSON		'Cost Effective Cony	llance & Remediation"				
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And the second s	Camden, NJ	98102	leb Lecation:				
Aitention	Ray	er er en	Dute of Fire:	FAX 8: 609-962-7075			
We bereby submit ap	enfications and estimates for	Transportation and Stattard Mineral S	i Disposal of Approximat pirits (Nov-Hazardous)	tely 660 Gallons (12 Drums) per Ray sa Follows:			
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State of New Jersey Department of Environmental Protection Hazardous Waste Regulation Program Manifest Section CN 421, Trenton, NJ 08625-0421



JOB # 2937

PI	ease type-or print in block letters. (Form designed i	or use on elite (12-pit	ch) typewriter.)		Form Appro	ved. OMB	No. 2050	1-0039. Expires 9	9-30-96	
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	Prickett's Ind. Tank Cleani 1940 Harris Drive		A. State Manifest Document Number NJA 2287232							
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	4. Generator's Phone (609) 228-1	.071	US EPA ID Number		l ^B Hr. Cleaner, 1406 Collings R Camden, N.J.					
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	7. Hansporter 2 Company Name	8.	US EPA ID Number		D Transporte			228-107	1_	
	9_ Designated Facility Name and Site Address	10.	US EPA ID Number		E. State Trans. ID-NJDEPE					
	Prickett's Ind. Tank Cleani	ng Corp.	oo El Alle Hallibol		F Transporter's Phone ()					
	1940 Harris Drive Deptford, NJ 08096				G. State Facility's ID					
	Deptiora, No 08096	[N]J	[D0 7 1 4 5 4	21716	H. Facility's I	none (6	09)	228-1071		
	11. US DOT Description (Including Proper Shipping	Name, Hazard Class o		12. Conta	iners	13. Total	14.	1.		
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	Combustible liquid NO X PG III (X722)	S (Fuel oil	L) NA 1993	0.0.1	T TOO	la Di A	C	X 7 2		
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-	J. Additional Descriptions for Materials Listed Above	ve			K. Handling (Codes for W	astes Li	isted Above		
	L. & T. Fuel oil Q) %			•					
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1	b.	d.			b.		d.			
1	15. Special Handling Instructions and Additional Info Hazardous waste in New Jerse	ormation Not not a	coordina to mor	777.3						
I	24 hour emergency phone # (6	09) 228-1071	ccording to USE	SPA					1	
-	Emergency response guide # 2	27			Deca1	# 72	7	11	- 1	
T	16. GENERATOR'S CERTIFICATION: I hereby declar	are that the contents of	this consignment are fully a	nd accurate	ly described it	www. but men	are ob.		are	
	classified, packed, marked, and labeled, and a government regulations.	re in all respects in pro	oper condition for transport	by highway	according to	applicable	internat	tional and natio	nal	
-	If I am a large quantity generator, I certify that I I	nave a program in place	to reduce the volume and t	oxicity of wa	iste generaled	to the degr	ee I hav	e determined to	be	
1	future threat to human health and the environmen	nt; OR. if I am a small or	of treatment, storage, or dis	enneal curro	othe available t	a mer tedarah	*******			
1	the best waste management method that is avail Printed/Typed Name	lable to me and that I co	an afford.						_	
1	Raymond E. Martin JR.		Signature	060	CMI.	to	/ M	TIME.	ear	
1	17. Transporter 1 Acknowledgement of Receipt of M.	aterials	ayour	7 6	May	ung		לוסטוריב.	4	
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-	18 Transporter 2 Acknowledgement of Receipt of Ma	atenals	The second secon				The same of the sa			
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1	19 Discrepancy Indication Co.									
-	19. Discrepancy Indication Space						30		1	
			*						C	
T	20. Facility Owner or Operator: Certification of receip	t of hazardous materials	s covered hyathis manifest of	except as co	tod in Item 10				+	
1	Printed/Typed Name Raymond E. Martin JR.		Signature	1 1	11	_/	Mo	onth Day Ye	ar C	
L			Kaymend	0	Tacken	*	Ye	4089	65	
P	A Form 8700-22 (Rev. 9/88) Previous editions are obsolete	A STATE OF THE PARTY OF THE PAR	CICNOTADE AND IN	CODMA	FULL RALLOT P	FIRM	1 10	111 00		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2

DATE: 7/27/98

SUBJECT: Fate of Quality Cleaner petroleum solvent waste

FROM: Margaret Halley

TO: My File

At ~ 8:50 am, Mickey Wenclawiak of Atlas [type of middleperson between APCON and International Petroleum (IPC)] returned my call. He said the petroleum solvent waste was taken to Delaware to IPC. The contact there is Paul McDaniel at (800) 222-2511. He said the petroleum waste was pumped out of 12 drums. I asked him how the petroleum solvent waste got from the tank to the drums, and he said he didn't know. I said apparently there was no TCLP testing done or hazardous waste determination made. I told him what I did have, which is the laboratory analysis and the invoice from APCON. He said he'd FAX the invoice from IPC. He did. Was not really a manufest but three of

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Rate Kesayan, Quality Channels

(609) 962-7488

INTERNATIONAL
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Ray Called France
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FAX COVER SHEET

TO:	Margaret Halley EPA.
ATTENTION:	Margaret Halley EPA. 212-637-4949
FAX NUMBER:_	
NO. OF PAGES	INCLUDING THIS COVER SHEET: 3
FROM:	
FAX NO:	(302) 421-9099
RE:	Guality Cleaners - Landen, MJ.

IMPORTANT NOTE: This facsimile contains privileged and confidential information intended only for the use of the addressee (s) named above. If you are not the intended recipient of this facsimile, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that an dissemination or copying of this facsimile is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and return the original facsimile to us at the address below via the U.S. Posta Service. Thank You.



September 1, 1998

Raffe Kesayan Quality One Hour Cleaners 1406 Collings Road Camden, NJ 08104

RE:

Product Removal

Dear Mr. Kesayan:

IPC removed non-hazardous product from your business on October 2, 1996. The product was transferred to our Wilmington, DE refining plant for processing. The attached description outlines the procedure used in the treatment of the waste. All incoming waste is tested for acceptability before the company truck is off loaded. In this case there was no problem. The waste in question had been tested for Atlas Environmental

We hope this will bring this matter to a close.

Sincerely yours,

Ed Flake Vice President

CC/Margaret Halley EPA Office

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► The Recycling Process

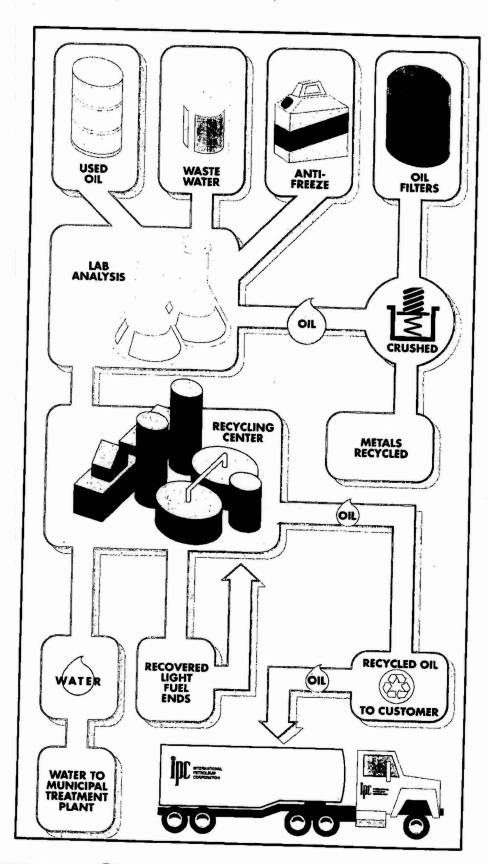
IPC has five collection basins in the Southern and Mid-Atlantic states which comprise 40 percent of the population of the United States. Hub operations are located in Wilmington, Delaware; Plant City, Florida; Atlanta, Georgia; New Orleans, Louisiana; and Baltimore, Maryland. The Delaware, Florida, and Louisiana operations are full-scale recycling plants.

The Recycling Process

The Company uses a closed-loop, two stage recycling process:

Stage 1). Atmospheric distillation (created by heat application) separates light fuel oil and water from used oil feedstock or petroleum contaminated waste water. The light oil distillates are returned to power the recycling plant which is almost energy self-sufficient, and the water is treated and released by permit into the local municipal water treatment system. The remaining feedstock is processed further in Stage 2.

Stage 2). Vacuum distillation (created by heat and vacuum application) removes any additional trace water and light fuel ends from the used oil. The remaining feedstock is sold as is, or it is blended to customer specification into various non-hazardous oil products and shipped. The Company's energy products range from commercial diesel fuel to #6 grade residual oil.



FROM: ATLAS ENVIRONMENTAL PHONE NO.: 2153332551 Jul. 27 1998 08:29AM P2 TO:2153332551 PAGE: 01 302-421-9099 APR-28 98 14:09 FROM: IPC DE Sint(FAX'col) From Atlan International **USED OIL MANIFEST** 505 S. Market St. 6305 E Lombard St. Baltimore, MD 21224 Wilmington, DE 18801 (NON-HAZARDOUS) 1-302-421-9306 1-410-633-0606 1-800-222-2511 40629 OTHER I.O.S. LOCATIONS Fairborn, Georgio Plant City, Florido Now Orleans, Louisiana EPA. I.D. NO. DED984073692 DATE OF BERVICE E.P.A. I.D. NO. MDD985389818 10-02-9 COMPANY AND LOCATION BILLING, ADDRESS SW CONTACT TIME OF SERVICE TANK SIZE STARTING ENDING VOLUME WASTE DESCRIPTION . TOTAL ENCHING. HIW SOZ WATER TANK MONITOR SERVICE 20/Drums = 240.07 LO.S. ASSUMES RESPONSIBILITY FOR THE SAFE REMOVAL AND RECYCLING/TREATMENT OF WASTE FLUIDS IN. ACCORDANCE WITH ALL STATE AND FEDERAL LAWS. CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. INVOICES REFLECTING CHARGES TO CUSTOMER ARE SUBJECT TO AN INTEREST RATE OF THE LESSER OF 1 1/2% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY INVOICES THAT ARE NOT PAID WITHIN SO DAYS. IN THE EVENT OF DEFAULT, INTERNATIONAL OIL SERVICES SHALL BE ENTITLED TO RECOVER COSTS OF COLLECTION, INCLUDING REASONABLE ATTORNEY'S FEES. GENERATOR WARRANTS AND REPRESENTS THAT THE MATERIALS

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GENERATOR WARRANTS AND REPRESENTS THAT THE MATERIALS PROVIDED INTERNATIONAL OIL SERVICES HEREUNGER MAVE NOT BEEN MIXED. COMBINED, OR OTHERWISE BLENDED IN ANY QUANTITY WITH MATERIALS CONTAINING POLYCHLORINATED BIPHENVLS (PCB) OR ANY OTHER MATERIAL DEFINED AS A MAZARDOUG WASTE UNDER APPLICABLE LAWS INCLUDING BUT NOT LIMITED TO 40 CFR PART 381. GENERATOR AGREES TO INDEMNIFY AND WOLD INTERNATIONAL OIL SERVICES HARMLESS FOR ANY DAMAGES, COSTS, ATTORNEY'S FEEG, ETC. ARISING OUT OF OR IM ANY WAY RELATED TO A BREACH OF THE ABOVE WARRANTY BY THE GENERATOR.

X DENERATOR/CUSTOMER SIGNATURE

USED

FROM: ATLAS ENVIRONMENTAL

PHONE NO. : 2153332551

Jul. 27 1998 08:28AM P1

Atlas Environmental Services & Equipment Company 6801 State Road, Bldg.A, Philadelphia, PA 19135

facsimile transmittal

To: MAK	GRET	HALL	EY Fai	« 212-	-637-	-4949	'
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Raffe Kesayan, Owner Quality One Hour Cleaners 1406 Collings Road Camden, New Jersey 08104

RE: Quality One Hour Cleaners

EPA ID. Number NJD981489677/NJDEP ID. Number NJX000316968

Dear Mr. Kesayan:

Your submittals in response to the U.S. Environmental Protection Agency's Notice of Violation (dated August 20, 1998) have been deemed insufficient. This finding is in accordance with the regulations under the Resource Conservation and Recovery Act (RCRA), the law governing the handling of hazardous waste.

Your submittals did not confirm that *mineral spirits* were removed from two (2) one thousand (1,000) gallon underground storage tanks, as you indicated to the inspectors on January 14, 1998, during the RCRA compliance evaluation inspection and referenced in your letter dated April 19, 1998 (copy attached). Information from the International Petroleum Corporation of Delaware (IPC) included a submittal of a used oil manifest (date of service 10/2/96). IPC indicated that the waste removed was twelve (12) 55 gallon drums of *waste oil*, or six hundred and sixty (660) gallons of waste oil. This is a discrepancy in your claim vs. IPC's claim concerning the content of the wastes disposed by IPC from your facility.

Within thirty (30) calendar days of receipt of this letter, explain the above discrepancies:

- 1. Your identification of the waste as mineral spirits and IPC's identification of it as waste oil: and
- 2. Explanation of why only 660 gallons were disposed by IPC, while the waste removed came from two tanks of 1,000 gallons each.

Please provide the information requested to:

Ms. Margaret Halley, RCRA Enforcement Officer 2 DECA-WCB
U.S. Environmental Protection Agency-Region 2
290 Broadway, 20th Floor
New Yrk, New York 10007-1866

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Should a situation arise in the future which requires you to remove a waste of unknown origin from your facility, you must make hazardous waste determination. This may include testing the waste under the Toxicity Characteristic Leaching Procedure. For the perchloroethylene ("perc") hazardous wastes (F002, D039) you are currently generating, "knowledge of process" is sufficient, i.e., your determination by knowing that you are using perc product in your operations and that, logically, the resulting waste will be a hazardous waste.

If you have questions, please contact Margaret Halley at (212) 637-3092. If you have other questions about the requirements of RCRA, you may call the toll free hotline at (800) 424-9346, which has been established to address inquiries.

Sincerely,

Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc: M. Halley, DECA-GWCS

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1/15/99

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Should a situation arise in the future, however, which requires you to remove a waste of unknown origin from your facility, please be reminded that you are required by law to determine whether the waste which is hazardous. This may include sampling and analysis of the waste under the Toxicity Characteristic Leaching Procedure. (In order to clarify why the law does not require you sample and analyze the perchloroethylene ("perc") hazardous wastes (F002, D039) generated by your dry cleaning operations, you know what it is. This is called using "knowledge of process." It means that you are making your determination by knowing that you are using perc product and that the resulting waste will a hazardous waste.)

If you have further questions, please contact Margaret Halley at (212) 637-3092. If you have other questions about the requirements of RCRA or other environmental laws, you may call the toll free hotline at (800) 424-9346, which has been established to address inquiries.

Sincerely,

Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc:

Margaret Halley, 2DECA-WCB

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Joel Golumbek, Chief Hazardous Waste Compliance Section

bcc:

Margaret Halley, 2DECA-WCB